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FINAL ASHLEY CREEK GRAZING MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT

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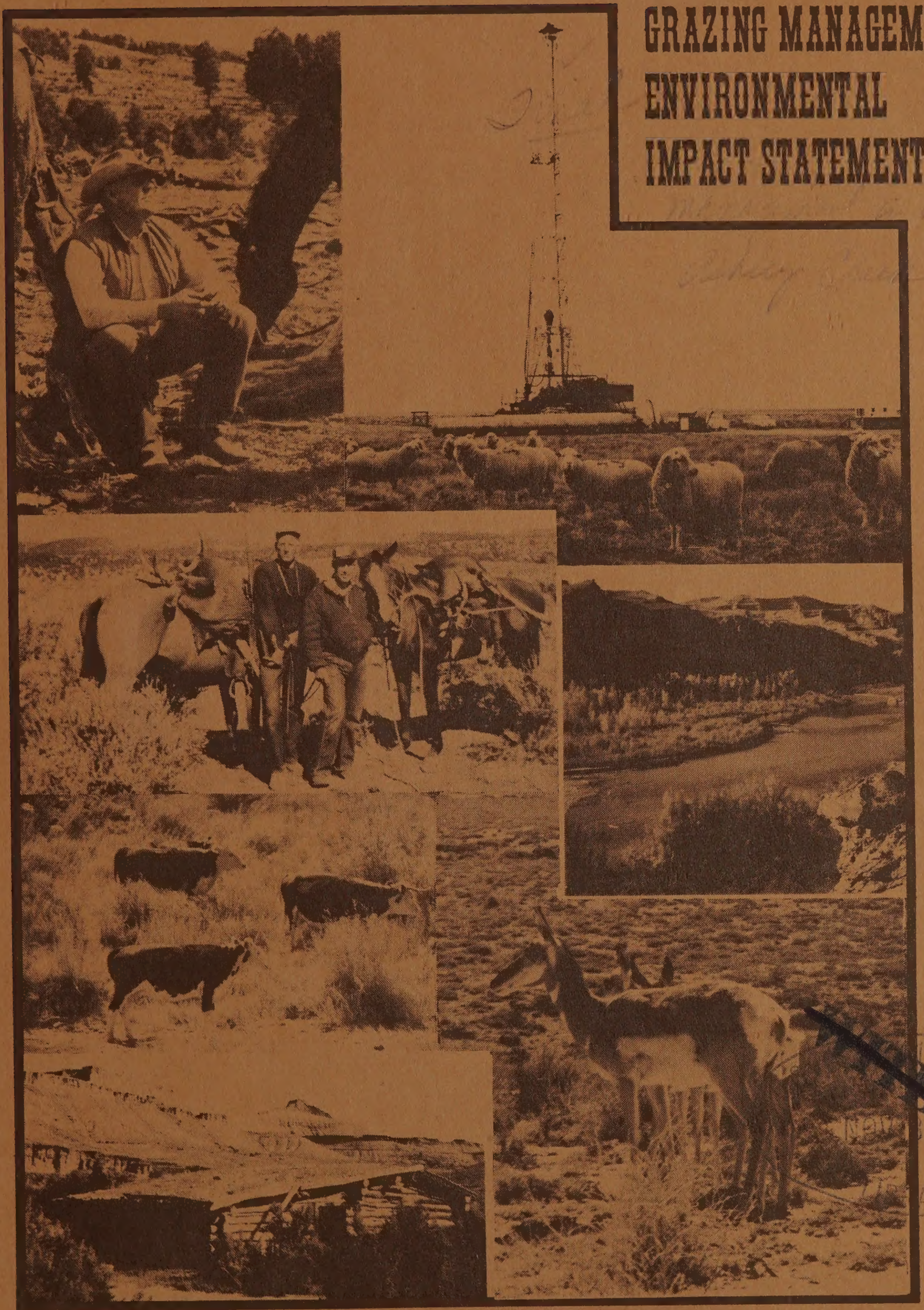

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UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT,
UTAH SEPTEMBER 1982

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March 3, 1849

United States Department of the Interior

IN REPLY REFER TO
1792
(U-050)

BUREAU OF LAND MANAGEMENT
VERNAL DISTRICT OFFICE
170 South 5th East
Vernal, Utah 84078

September 1982

Dear Reader:

Enclosed for your review and comment is the Final Environmental Impact Statement prepared for the proposed grazing management program for the Ashley Creek Planning Area in Uintah, Duchesne, and Carbon Counties, Utah. Decisions on this project will not be made until at least 30 days after the EPA Final EIS Notice of Availability has appeared in the Federal Register. During that 30-day period, written comments on the Final EIS may be submitted to be considered in the decision-making process at the following address: Vernal District Office, Attn: Lloyd Ferguson, 170 South 5th East, Vernal, Utah 84078, Phone: (801) 789-1362

The EIS was prepared pursuant to Section 102 (2)(c) of the National Environmental Policy Act (NEPA) of 1969. It is based on information from the Bureau of Land Management and other sources, including Federal, State, and local agencies, and interested private organizations and citizens. Because no concerns raised during the public review of the Draft EIS required major revisions of the document, the Final EIS has been prepared in an abbreviated format consistent with provisions of section 1500 of 40 CFR, the Council on Environmental Quality's regulations for the implementation of NEPA. The Final EIS includes all comments received during the public review, responses to each comment, and required modifications of the text. This document should, therefore, be used in conjunction with the previously published Draft EIS.

A limited number of copies of the Draft EIS are available upon request at the following addresses:

Utah State Office
University Club Building
136 East South Temple
Salt Lake City, Utah 84111
Phone (801) 524-4227

Vernal District Office
170 South 5th East
Vernal, Utah 84078
Phone (801) 789-1362

Richfield District Office
150 East 900 North
Richfield, Utah 87401
Phone (801) 896-8221

Sincerely,

Lloyd H. Ferguson
District Manager

#94380 64

ID: 88077208

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A84
1982b

DEPARTMENT OF THE INTERIOR
FINAL
ENVIRONMENTAL IMPACT STATEMENT
FOR
GRAZING MANAGEMENT IN THE ASHLEY CREEK PLANNING AREA

PREPARED BY
BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR

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Roland G. Robison

UTAH STATE DIRECTOR, BUREAU OF LAND MANAGEMENT

ABSTRACT

The Bureau of Land Management (BLM), as part of their planning process for the Ashley Creek Planning Area and in response to a 1973 court suit, has prepared this Environmental Impact Statement (EIS). The BLM proposes to update livestock management on 65 allotments in the Diamond Mountain Resource Area of the BLM Vernal District. The planning area contains 527,974 acres of allotted public lands located in Duchesne, Uintah, and Carbon Counties in northeastern Utah. Management alternatives were identified during preparation of the Management Framework Plan. This EIS analyzes the environmental, cultural, and socioeconomic consequences of the alternatives. In the long term under each alternative (with the exception of Alternative 3, No Action) vegetation production and ground cover would increase, overall watershed condition, wildlife habitat, and surface water quality would improve, soil erosion would decrease, and regional income would increase. Proposed vegetation manipulation would somewhat degrade the area's scenery. Continued soil erosion, cattle trampling, and some vegetation manipulation would slightly disturb cultural resources. Riparian areas would improve only in the proposed action and in Alternative 5. Ranch income and capital values would decrease in some alternatives.

For Further Information Contact: Lloyd Ferguson, Vernal District Office, Bureau of Land Management, 170 South 500 East, Vernal, Utah 84078, or call (801) 789-1362.

Comments on the Final EIS are Due: October 30, 1982

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COORDINATION, CONSULTATION, AND REVIEW OF THE DRAFT EIS

The Draft Environmental Impact Statement (EIS) was filed with the Environmental Protection Agency (EPA) and made available to the public on June 18, 1982. Its availability and the time and place for the public hearing were announced by the Department of Interior in the Federal Register on June 9, 1982. A news release was also prepared to alert local residents about the comment period on the Draft EIS. August 11, 1982 was established as the deadline for submission of written comments.

The list of agencies and individuals who have received copies of the Draft EIS is available for review at the Bureau of Land Management (BLM) District Office in Vernal, Utah. The Draft EIS also contains a list of agencies and interested groups from whom comments were requested. Comments were also requested from affected livestock permittees and interested individuals.

A public hearing was held on July 15, 1982 at the Uintah County courthouse in Vernal, Utah. Copies of the hearing transcript from the public meeting, along with the attendance list, are available for public review at the BLM District Office in Vernal.

All written comments and oral testimony from the public hearings were reviewed for consideration in preparation of this Final EIS. Those comments that presented new data, questioned facts and/or analyses, and raised questions or issues bearing directly upon the Draft EIS were responded to by the BLM. Letters which were general or did not contain substantive comments were reviewed but no responses were made.

Decisions on this project will not be made until at least 30 days after the EPA Final EIS Notice of Availability has appeared in the Federal Register. During that 30-day period, written comments on the Final EIS may be submitted to be considered in the decision-making process at the following address:

Vernal District Office
170 South 5th East
Vernal, Utah 84078
Phone: (801) 789-1362

REVISIONS TO THE DRAFT EIS

Because the revisions to the Draft EIS resulting from public comments were minor, no addendum is contained in this Final EIS. All revisions are addressed in responses to comment letters and appear underlined in this Final EIS. Bleeder tabs have also been provided to distinguish pages containing text revisions.

As a result of public comment, one new appendix addressing economic analysis is included in this Final EIS. Appendix A appears after the section containing comment letters and responses. Several new references are also included in this Final EIS and appear after Appendix A.

ORAL TESTIMONY FROM THE PUBLIC HEARING

Two persons commented at the public hearing held on July 15, 1982.

Mr. Michael R. Sibbett, representing the Utah Cattlemen's Association, read Comment Letter No. 7 into the record. Comments and responses to that letter are answered in the Letter Comment and Response section.

Mr. H. Maughan Colton stated that he had not received a copy of the Draft EIS. The Vernal District staff contacted a sample of the mailing list for the Draft EIS and found that most people had received their mailed copies. Copies were delivered to those on the mailing list not receiving a copy.

Mr. Colton also stated that he was concerned about the size of the planning area. The size of the planning area is smaller than most, and diversity is about the same as other planning areas. It should be pointed out that, during the 5-year monitoring program and following its completion, on-the-ground planning will be conducted on an allotment basis.

LETTER COMMENTS AND RESPONSES

Written comments received on the Draft EIS are indexed below. Following this index are copies of all comment letters received, along with responses to comments.

Comment Letter	Index No.
Sohio Shale Oil Company	1
Minerals Management Service	2
Utah Wool Growers	3
Utah Division of State History	4
Utah Nature Study Society	5
U.S. Bureau of Reclamation	6
Utah Cattlemen's Association	7
Utah Department of Natural Resources and Energy	8
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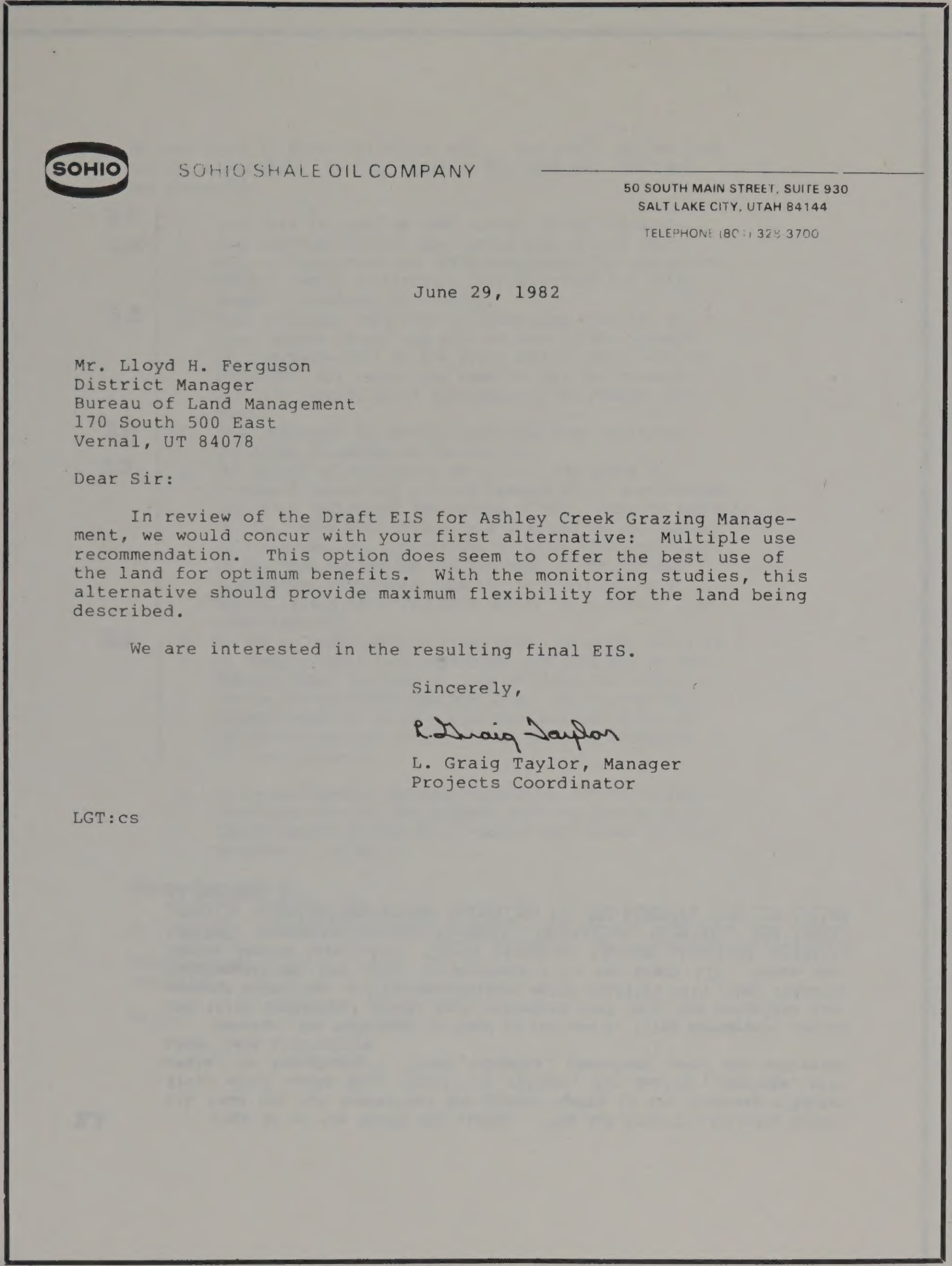
Fish and Wildlife Service	10
Fish and Wildlife Service	11
Environmental Protection Agency	12
Utah State University, Cooperative Extension Service	13
State of Utah, Office of the State Planning Coordinator	14

Comment Letter 1



SOHIO

SOHIO SHALE OIL COMPANY

50 SOUTH MAIN STREET, SUITE 930
SALT LAKE CITY, UTAH 84144

TELEPHONE (801) 328 3700

June 29, 1982

Mr. Lloyd H. Ferguson
District Manager
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Sir:

In review of the Draft EIS for Ashley Creek Grazing Management, we would concur with your first alternative: Multiple use recommendation. This option does seem to offer the best use of the land for optimum benefits. With the monitoring studies, this alternative should provide maximum flexibility for the land being described.

We are interested in the resulting final EIS.

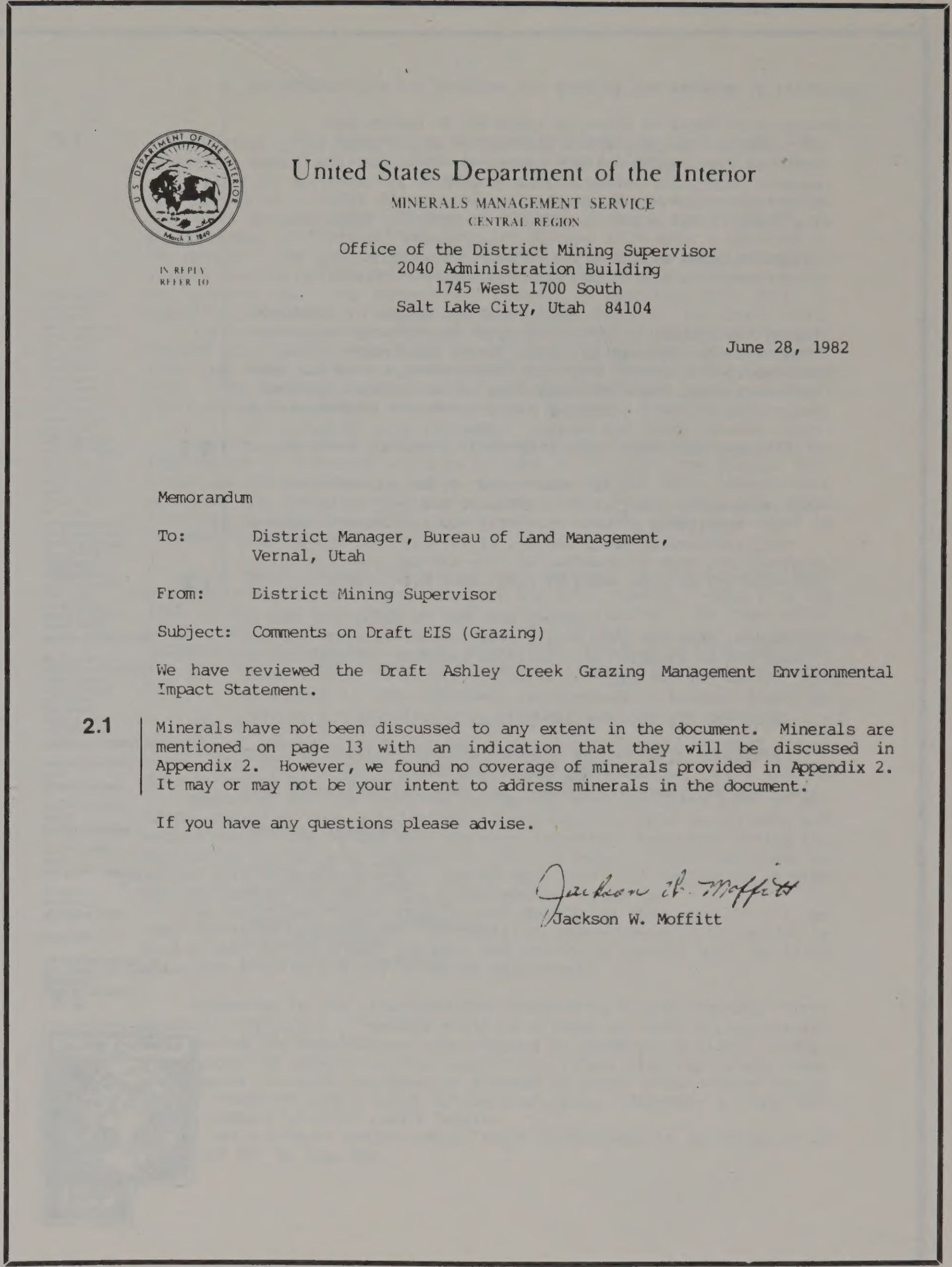
Sincerely,

L. Graig Taylor

L. Graig Taylor, Manager
Projects Coordinator

LGT:cs

Comment Letter 2



United States Department of the Interior
MINERALS MANAGEMENT SERVICE
CENTRAL REGION

Office of the District Mining Supervisor
2040 Administration Building
1745 West 1700 South
Salt Lake City, Utah 84104

March 3, 1849

IN REPLY REFER TO

June 28, 1982

Memorandum

To: District Manager, Bureau of Land Management,
Vernal, Utah

From: District Mining Supervisor

Subject: Comments on Draft EIS (Grazing)

We have reviewed the Draft Ashley Creek Grazing Management Environmental Impact Statement.

2.1 Minerals have not been discussed to any extent in the document. Minerals are mentioned on page 13 with an indication that they will be discussed in Appendix 2. However, we found no coverage of minerals provided in Appendix 2. It may or may not be your intent to address minerals in the document.

If you have any questions please advise.

Jackson W. Moffitt

Jackson W. Moffitt

Response Letter 2

2.1 Page 67 of the Draft EIS states: "The BLM interdisciplinary analysis team has not identified any change agents in the proposed alternatives which would have impacts on climate, air quality, geology, minerals, or topography." These subjects, therefore, were not addressed under each alternative.

However, the reference to Page 13 (column 2, first paragraph, second and third sentences) should have reflected that only the rangeland management objectives and recommendations which conflict with other resource recommendations are shown in Appendix 2 in the Draft EIS. These sentences should have read: "These resources include rangeland, wildlife habitat, watershed, forest products, recreation, minerals, and lands. Specific rangeland management objectives for the planning area are listed in Appendix 2."

Comment Letter 3

Utah
Wool Growers

10 WEST 100 SOUTH
SUITE 600
SALT LAKE CITY, UTAH 84101
TELEPHONE 359-3972

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Warren Williams
Vern Wilson
John Wintch
Malcolm Young

June 29, 1982

Mr. Lloyd H. Ferguson
District Manager
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, UT 84078

Dear Mr. Ferguson:

Your invitation for Utah Wool Growers to comment on the draft of Ashly Creek Grazing Management Environmental Impact Statement has been received and our comments are herewith submited:

Chapter 2 - Description of Alternatives, Initial Stocking Paragraph 2 - Your statement "Adjustments in present livestock grazing would be initiated during the 1984 grazing season, based on the District Managers decision. Adjustments in big game numbers would be accomplished through BLM and UDWR recommendations to the Utah Board of Big Game Control".

3.1 Your adjustment with permittees is based only on the decision of the District Manager--not on cooperation with the permittee. Undoubtedly your feeling is the permittee is not qualified to make recommendations--this is a sign of dictation, yet you listen to UDWR and seemingly accept their recommendations--you state everything is equal--this isn't.

3.2 In reviewing Chapter 2, Page 24 Initial Stocking, Priority for Stocking Your statement, "Future available storage would be distributed during the third and fifth years of monitoring. Livestock operators would be allowed to graze their livestock above active preference until big game numbers increased enough to use the additional forage on all allotments. Permits for this additional grazing would be issued on a temporary basis. Priorities in descending order would be:

1. Maintain present big game use on all allotments.
2. Allow livestock grazing up to active performance on all allotments.
3. Allow big game to increase to prior stable AUM's for deer and the objective stocking AUM's for elk and antelope on crucial winter range.
4. Divide forage increases equally between big game and livestock on non-crucial areas. If this forage was not needed by big game, it would be given to livestock."

The suggestions are increase big game at the expense of livestock.

Comment Letter 3

We have tried to carefully review all of the draft, and we used the above examples. We find numerous problems and questions, but primarily:

3.3 1. Your data is based on 1960 survey, hardly adequate.

3.4 2. Your proposal on your monitoring from 2 to 5 years with certain areas now being considered for evaluation after 2 years, is hardly a fair appraisal--it takes longer to evaluate our ranges.

3.5 3. Your continual reference to increasing wildlife to prior stable levels can only be done at the expense of livestock--what is the prior stable level, why not identify? All priorities seem to lead to increase wildlife regardless of alternative, and reduce livestock.

3.6 4. Your statement of certain areas now over obligated and again livestock is the culprit.

3.7 5. The method of adjustment means in a few years our livestock operations will be reduced to an uneconomical unit thus furthering the demise of the livestock industry. Oh yes, there will always be a few just so you can say multiple use--but not the way or under the conditions it has been supporting the tax base of the various communities developing jobs for many and making a honest living for a few with desire to be in the livestock business.

3.8 6. We see no consideration given when increasing wildlife to these private land owners who are adjacent to the BLM and their land may be more critical for winter forage for wildlife than BLM land. We believe these owners should be given every consideration prior to wildlife increases as again your wildlife tresspass on their property.

7. It is our opinion whenever priorities are to be issued the first priority and highest priority should go to improving and increasing livestock and second priority be given to wildlife.

Sincerely,

Malcolm Young
President

MY:ts

Response Letter 3

3.1 The text cited is only a brief outline of the process involved. The permittees have been consulted throughout the planning process. Their cooperation is essential to develop a good rangeland management program. The purpose of the EIS is to analyze and provide review to interested people on proposed and alternative programs. After the Final EIS is prepared and distributed, the District Manager will make a decision on the program. The permittees and BLM officials will then begin to cooperatively develop AMPs which will outline individual allotment development and grazing use. The cooperative process is described more fully in Chapter 2, Monitoring Program section (Pages 27-28 of the Draft EIS).

The cooperative process differs from that of managing big game because it is BLM's responsibility to study big game habitat in cooperation with UDWR and make a recommendation to the Board of Big Game Control. The Board is authorized to make adjustments to hunting seasons. Those adjustments control the numbers of big game.

3.2 According to the Priorities for Determining Future Stocking section, Alternative 1, livestock would be allowed to increase from average licensed use (22,748 AUMs) to active preference (33,303 AUMs) before there would be any increase in big game AUMs over current use. Only after livestock had reached active preference would big game be allowed to increase to prior stable levels.

3.3 Data based on the 1960 survey was necessary because no other data was available in some cases. Most of the data, however, comes from the 1960 survey plus data from current monitoring studies. The combination of the data gives a fairly good basis for analysis purposes. To better understand what data was used in a specific allotment and the rationale for that data, please refer to Appendix 2, Pages 111-123 in the Draft EIS.

3.4 The monitoring schedule outlined on Pages 27-28 of the Draft EIS provides an adequate basis for making grazing decisions. On most allotments, the data gathered during monitoring would contribute to grazing data collected over the past 5, 10, or 20 years.

Decisions will be based on monitoring data collected over an extended period of time, considering varying stocking rates and climate and weather conditions, along with the more intensive study made during the monitoring period with controlled stocking rates. Final decisions on active grazing preference will not be made until all monitoring studies are analyzed at the end of the 5-year monitoring period.

As indicated in the schedule, all monitoring study results will be made available to permittees. In addition, permittees will be invited to participate in the study process, and necessary changes will be fully discussed prior to officially making adjustments.

3.5 According to the priorities for determining future stocking levels under Alternative 1, livestock would be allowed to reach active preference before big game numbers were allowed to reach prior stable levels. Only under the priorities for determining future stocking levels under Alternative 5 would big game be allowed to reach prior stable levels before livestock could reach active preference. Appendix 1 lists the actual numbers of prior stable levels.

A definition of prior stable levels is included in the Glossary of the Draft EIS on Page 156.

Response Letter 3

3.6 The Standard Design, Construction, and Operation Features section (Pages 28-29 of the Draft EIS) establishes a minimum of two complete growing seasons with no livestock use to establish new plants. This is recognized by experts as a minimum of rest required after a reseeding or improvement project. However, prior to a rangeland improvement program on an allotment, livestock permittees would be consulted and a grazing program worked out and agreed upon prior to any work being done. Should the livestock permittees not want to participate in an improvement project, in most cases that project would be moved to another allotment. The allotment would then be adjusted to the indicated grazing level without the benefit of forage and management improvements.

3.7 The adjustments proposed in the Draft EIS are designed to improve rangelands in the least time possible, without causing undue hardship to any particular user group. The intent is to improve the rangeland, thus benefitting those who use it. In the proposed action (Alternative 1), only two allotments are scheduled to receive reductions, while 47 allotments would receive increases, and 16 would remain at present average use.

3.8 We realize that big game use on private land has been an issue of concern to landowners. The purpose of the EIS, however, is to address the impacts of livestock and big game grazing on public land. It would be impossible to increase big game grazing on public land and not increase big game grazing on adjacent private land.

Comment Letter 4

SCOTT M. MATHESON
GOVERNOR

STATE OF UTAH
DEPARTMENT OF COMMUNITY AND ECONOMIC DEVELOPMENT

Division of State History
(UTAH STATE HISTORICAL SOCIETY)

MELVIN T. SMITH, DIRECTOR
300 RIO GRANDE
SALT LAKE CITY, UTAH 84101
TELEPHONE 801 / 533-5755

July 6, 1982

Mr. Lloyd Ferguson
District Manager
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Re: Ashley Creek, Grazing Statement

Dear Mr. Ferguson:

The staff of the Utah State Historic Preservation Officer has received, for consideration, the Draft E.I.S. Ashley Creek Grazing Management Statement.

4.1 Due to the fact that the information is limited in the document dealing with cultural resources, we can provide no comment at this time.

The above is provided, upon request, as information or assistance. We make no regulatory requirements since that responsibility rests with the federal agency official. However, if you need additional assistance, please let us know. Contact Wilson Martin or Jim Dykman at 533-7039.

Sincerely,

Melvin T Smith

Melvin T. Smith
Director and
State Historic Prewservation Officer

JLD:lo F248/2047c

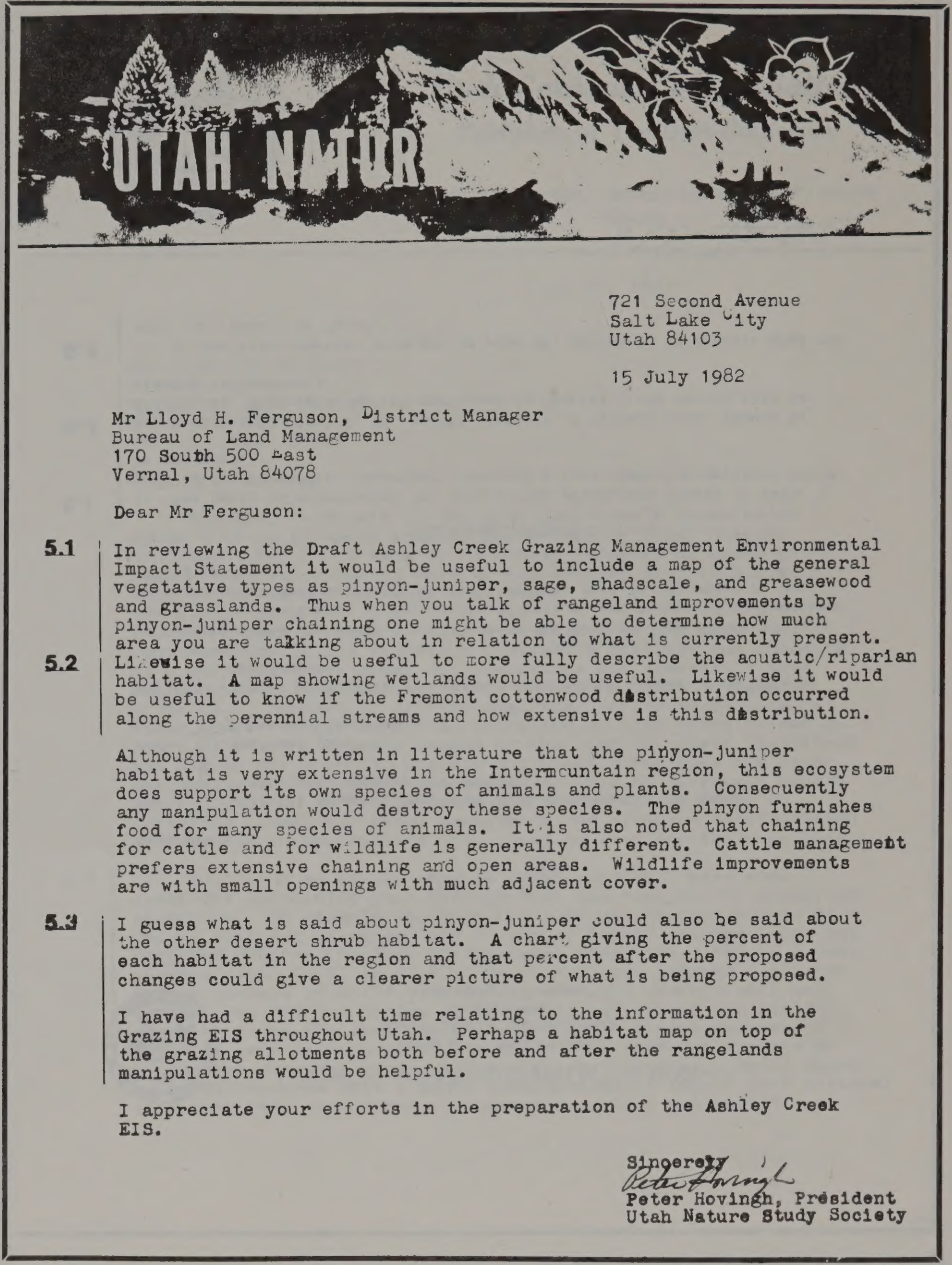
State History Board Milton C. Abrams, Chairman • Theron H. Luke • Ted J. Warner • Elizabeth Montague • Thomas G. Alexander
Dello G. Dayton • Wayne K. Hinton • Helen Z. Papanikolas • David S. Monson • Elizabeth Griffith • William D. Owens

Response Letter 4

4.1 Cultural resource information in the EIS is limited because of the very generalized nature of the proposal. Until the actual locations of ground-disturbing actions are specified, it is not possible to conduct inventories.

For detailed information regarding BLM's intended compliance with the National Historic Preservation Act, refer to the Draft EIS, Standard Design, Construction, and Operation Features section (protective measure No. 5, Pages 28-29, Chapter 2) and the Cultural Resources Memorandum of Understanding (Appendix 5, Pages 141-145).

Comment Letter 5



721 Second Avenue
Salt Lake City
Utah 84103

15 July 1982

Mr Lloyd H. Ferguson, District Manager
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Mr Ferguson:

5.1 In reviewing the Draft Ashley Creek Grazing Management Environmental Impact Statement it would be useful to include a map of the general vegetative types as pinyon-juniper, sage, shadscale, and greasewood and grasslands. Thus when you talk of rangeland improvements by pinyon-juniper chaining one might be able to determine how much area you are talking about in relation to what is currently present.

5.2 Likewise it would be useful to more fully describe the aquatic/riparian habitat. A map showing wetlands would be useful. Likewise it would be useful to know if the Fremont cottonwood distribution occurred along the perennial streams and how extensive is this distribution.

Although it is written in literature that the pinyon-juniper habitat is very extensive in the Intermountain region, this ecosystem does support its own species of animals and plants. Consequently any manipulation would destroy these species. The pinyon furnishes food for many species of animals. It is also noted that chaining for cattle and for wildlife is generally different. Cattle management prefers extensive chaining and open areas. Wildlife improvements are with small openings with much adjacent cover.

5.3 I guess what is said about pinyon-juniper could also be said about the other desert shrub habitat. A chart giving the percent of each habitat in the region and that percent after the proposed changes could give a clearer picture of what is being proposed.

I have had a difficult time relating to the information in the Grazing EIS throughout Utah. Perhaps a habitat map on top of the grazing allotments both before and after the rangelands manipulations would be helpful.

I appreciate your efforts in the preparation of the Ashley Creek EIS.

Sincerely
Peter Hovingh
Peter Hovingh, President
Utah Nature Study Society

Response Letter 5

5.1 A habitat map is available at the Vernal District Office and was used for analysis purposes in this EIS.

Proposed or alternative vegetation manipulation projects are not shown on vegetation maps because their exact locations and boundaries will not be known until on-the-ground planning is completed and clearances for endangered plants and cultural resources are done. However, vegetation manipulation projects would generally be made in pinyon-juniper areas.

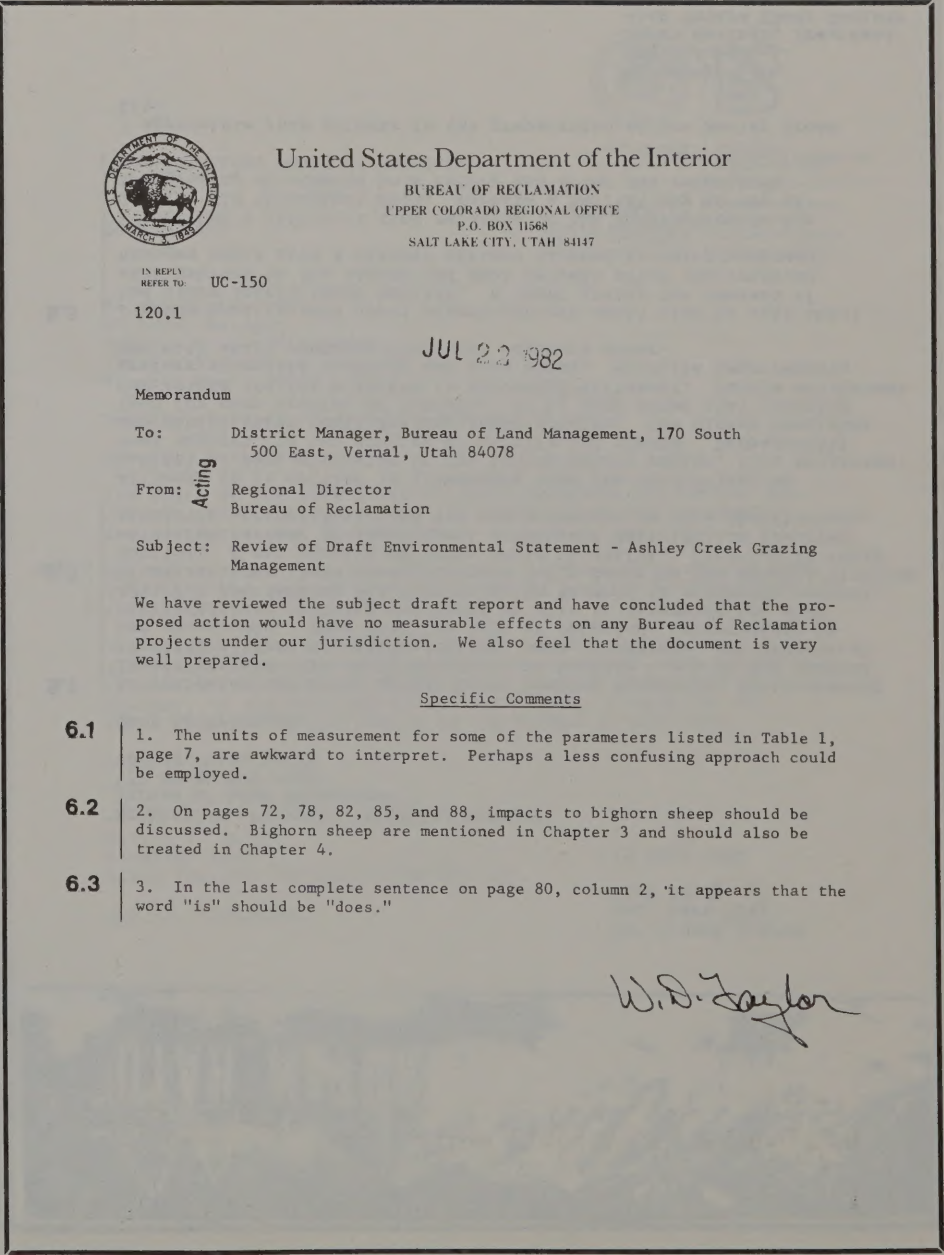
Table 3-1, Pages 45-46 of the Draft EIS, gives the percent of vegetation type for each allotment and specifies the acreage of established seedings. Wetland/marsh riparian habitat is included in this table.

The acres or percent of each vegetation type that would be modified by vegetation manipulation can be determined for each allotment or in total by: (1) finding the percent of vegetation type by allotment (listed in Table 3-1); (2) finding the total acres for each allotment (listed in Appendix 1); and (3) multiplying total acres by percent of vegetation type and comparing this figure with the amount of acres of vegetation manipulation proposed (listed in Appendix 3). This figure indicates how much of each vegetation or habitat type would be modified.

5.2 As indicated in Letter Response 5.1, acreage and percentage of the area of wetland/marsh riparian habitat are shown in Table 3-1 (Pages 45-46 of the Draft EIS). Data is not available to more fully describe the aquatic/riparian habitat or the distribution of Fremont cottonwood along the Green River.

5.3 Refer to Letter Response 5.1.

Comment Letter 6



United States Department of the Interior
BUREAU OF RECLAMATION
UPPER COLORADO REGIONAL OFFICE
P.O. BOX 11568
SALT LAKE CITY, UTAH 84147

IN REPLY REFER TO: UC-150
120.1

JUL 22 1982

Memorandum

To: District Manager, Bureau of Land Management, 170 South 500 East, Vernal, Utah 84078

From: Acting Regional Director
Bureau of Reclamation

Subject: Review of Draft Environmental Statement - Ashley Creek Grazing Management

We have reviewed the subject draft report and have concluded that the proposed action would have no measurable effects on any Bureau of Reclamation projects under our jurisdiction. We also feel that the document is very well prepared.

Specific Comments

6.1 1. The units of measurement for some of the parameters listed in Table 1, page 7, are awkward to interpret. Perhaps a less confusing approach could be employed.

6.2 2. On pages 72, 78, 82, 85, and 88, impacts to bighorn sheep should be discussed. Bighorn sheep are mentioned in Chapter 3 and should also be treated in Chapter 4.

6.3 3. In the last complete sentence on page 80, column 2, it appears that the word "is" should be "does."

W. D. Taylor

Response Letter 6

6.1 The units of measure on Summary Table 1, Page 7 of the Draft EIS, should be: Initial Stocking (AUMs), Allotments With AMPs (No.), Vegetation Manipulatjon Allotments (No.).

6.2 Bighorn sheep do not inhabit the planning area and, therefore, could not be impacted. Alternative 5 proposes to transplant bighorn sheep into Bull Canyon and Devils Canyon Allotments; forage is available for that transplant under that alternative.

6.3 The last complete sentence on Page 80 of the Draft EIS should read: "Although data does substantiate the occurrence of an adverse impact, it is not sufficient for quantifying the extent of this impact.

Comment Letter 7

Utah Cattlemen's Association
Publishers of The Utah Cattleman

One-fifty South Sixth East • Salt Lake City, Utah 84102 • 355-5748
Suite 108

July 15, 1982

Mr. Lloyd H. Ferguson
District Manager
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Mr. Ferguson:

Speaking on behalf of the Utah Cattlemen's Association I would like to formally comment on the Ashley Creek Grazing Management E.I.S. I know of no single industry or group of people that are affected more by the outcome of this E.I.S. than the livestock users of this land.

With this in mind I would sincerely hope and urge your consideration of the livestock operator's feelings and comments as a priority above other considerations and comments. Some might ask why livestock operators should be given a higher priority as opposed to recreationalists, environmentalists or other concerned citizens. Appreciating my bias being raised on a ranch, livestock growers depend on the land for their livelihood and day to day support, whereas any other group uses the land optionally for recreation or pleasure. The 60 livestock owners currently using BLM range lands will be among the first to recognize a need for range management and either a deterioration or increase in the foilage that could be used for their animals.

7.1 Following my review of this Draft project I have some questions concerning your average cost and returns for livestock operators. An example would be the cost per hundred pounds of calves that far in exceed any 3 year or 5 year average I can put together. Using the Utah Agricultural Statitics, 1982, a 3 year average using 79-81 is 75.83. Using a 5 year average 77-81 the calves average is 64.76. Analyzing 1981 the average calf was 63.30. How did you arrive at these prices? There are similar examples using the same years for lambs. A 3 year average of 59.06, 5 year average of 57.34, and a 1981 lamb Cwt average of 51.80 also shows an exaggeration with your figures. Would these price differences make a major socioeconomical impact more critical than what your environmental consequences have estimated?

Comment Letter 7

Mr. Lloyd Ferguson
July 15, 1982
Page Two

7.2 We would also urge a continual study of the present grazing capacity for a minumum of 3 years to be sure the information is correct before making any reduction. Most ranchers do not have a luxury in reducing their livestock because of a reduction in AUM's to later find out that the grazing really wasn't a problem.

In studying your alternatives 1 through 5 we were pleased to note that the elimination of livestock grazing was dismissed as an unreasonable alternative. Our recommendations of your specific alternations would include consideration of initial stocking found in alternative 1 if priority for future stocking showed livestock average use as a first priority, followed by big game present use as second priority as outlined in alternative 2.

7.3 We are concerned with the vegetation manipulation that would alter the current use of livestock grazers as this might cause undo hardship on not only the ranchers but the environment if ranchers were asked to graze different months of the year rather than their current pattern.

7.4 When consideration was given to the affected environment when considering both livestock and wildlife AUM's, was wildlife actually assessed for some of the enviromental damage rather than placing a disproportional amount of blame on livestock? **7.5** I noted when the Uintah Basin Hookless Cactus was mentioned that the most significant threat was removal by cactus collectors with other threats coming from potential flooding, off road vehicles, livestock trampling, and ground disturbance from oil shell development. I am assuming that elk, deer, antelope or other wildlife are not a threat in trampling the Hookless Cactus. Is this true?

In conclusion, the Utah Cattlemen's Association recognizes the importance of proper range management and encourages ranchers to do their part. I have found, however, that encouragement for proper range management is not needed as much as some environmental groups might suggest. Ranchers depend upon the land for their livelihood and proper range management is of more importance to them than any other group. We appreciate the opportunity to give testimony on this Draft E.I.S. and will continue to work closely with the BLM.

Sincerely,
UTAH CATTLEMEN'S ASSOCIATION

Mike R Sibbett

Michael R. Sibbett
Executive Vice President

MRS/be

Response Letter 7

7.1 The data used in the ranch budgets was provided by the Department of Agriculture, Economics, Statistics, and Cooperative Services (1981) and was based on interviews with local ranchers and U.S. Department of Agriculture data.

BLM is unable to determine the cause of the discrepancy you mention; however, the ranch budgets have been modified using a 3-year average (1978-80) taken from Utah Agricultural Statistics (Utah Department of Agriculture, 1982). These budgets and the modified partial budgets and impact tables appear in the Final EIS in Appendix A.

Since the modified figures would reduce gross income, this would result in lower net income and return figures. The relative magnitude of impacts between livestock size classes would be about the same as those indicated in the Draft EIS. Therefore, the Ranch Income and Capital sections of Socioeconomics (Chapter 4) have not been reprinted in this Final EIS.

7.2 See Letter Response 3.4 for a discussion of the monitoring schedule and implications.

7.3 Refer to Letter Response 3.6.

7.4 Both wildlife and livestock were considered in assessing the environmental damage to vegetation. A disproportional amount was not assessed to livestock. Table 3-3 (Pages 49-50 of the Draft EIS) shows vegetation utilization. Livestock and big game are listed in the same column on this table.

7.5 There are proportionately more livestock than big game throughout the planning area. Trampling would have the same effect, whether caused by livestock or big game. However, all big game in the planning area are native, and the Uinta Basin hookless cactus has evolved and survived regardless of big game population extremes. BLM investigations have shown that populations of this cactus are being reduced by livestock trampling (USDI, BLM, 1981).

STATE OF UTAH
OFFICE OF THE STATE PLANNING COORDINATOR

SCOTT M. MATHESON,
GOVERNOR

MARTHE F. DYNER,
STATE PLANNING COORDINATOR

August 3, 1982

Mr. Lloyd H. Ferguson
District Manager
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Mr. Ferguson:

SUBJECT: UT820611-010 DOI/BLM, Draft Ashley Creek Grazing Management EIS.

The Department of Natural Resources & Energy have reviewed your Draft Ashley Creek Grazing Management Environmental Impact Statement, and the comments are enclosed.

Thank you for allowing us time to consider this and comment.

Marthe F. Dyner

Marthe F. Dyner
State Planning Coordinator

enclosure
/dr

STATE OF UTAH
NATURAL RESOURCES & ENERGY
Wildlife Resources

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Douglas F. Day, Division Director

1596 West North Temple • Salt Lake City, UT 84116 • 801-533-9333

July 27, 1982

Mr. Hunter Weiler
R.D.C.C. Coordinator
State Planning Coordinator's Office
116 State Capitol
Salt Lake City, UT 84114

Dear Hunter:

We have reviewed the Bureau of Land Management's (BLM) "Draft Ashley Creek Grazing Management Environmental Impact Statement" (Ref. UT 820611-010) and have the following comments.

The BLM has selected alternative number one, the multiple use recommendation, as the proposed action. Priorities for future stocking given for alternative one are: 1) maintaining present big game numbers, 2) allowing livestock grazing up to active preference on all allotments and 3) allowing big game use to increase to prior stable AUM's for elk and antelope. We have prepared deer herd unit management plans that call for increasing deer to prior stable numbers.

8.1 It seems apparent to us that if alternative one is implemented, big game
numbers will most likely be held at current depressed levels. After livestock
grazing is increased from current levels to active preferenceas prescribed by
priority two, it is unlikely that any forage will be left for increasing big
game AUM's. If there is forage left over it would probably be on areas of
marginal value to wildlife, not on critical areas; therefore having little
8.2 practical value. We do not agree that big game numbers should be allowed to
increase to prior stable levels only after satisfying forage requirements of
increased numbers of livestock.

8.3 The BLM is directed to utilize all current forage production. In our view
8.4 increasing livestock use to active preference levels will exceed that goal and
result in continuing range deterioration rather than improvement implied by
the summary of environmental consequences for alternative one (page 70).

8.5 The ES acknowledges (Page 69) that when grazing pressure is increased,
consequential shifts in range plant communities will likely occur on at least
32 allotments. Such shifts in species abundance and cover types could
detrimentially affect wildlife populations in the future. We question the
8.6 appropriateness of implementing actions that are predicted to adversely effect
vegetation and further reduce range condition. Livestock use should not exceed
existing range capacity on any allotments.

Board/Warren T. Harward, Chairman • L. S. Skaggs • Lewis C. Smith • Jack T. World • Roy L. Young

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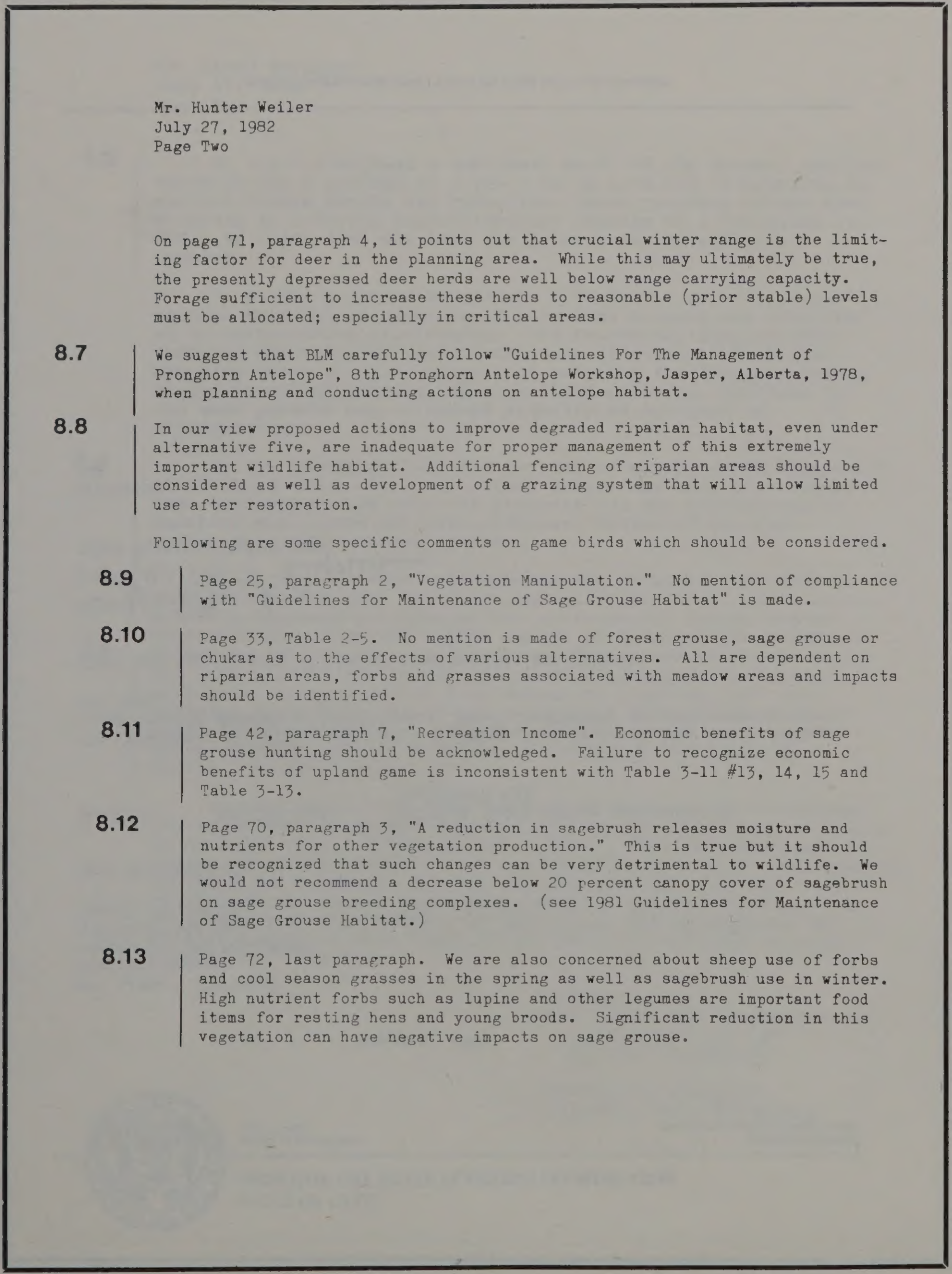
Comment Letter 8



Mr. Hunter Weiler
July 27, 1982
Page Two

On page 71, paragraph 4, it points out that crucial winter range is the limiting factor for deer in the planning area. While this may ultimately be true, the presently depressed deer herds are well below range carrying capacity. Forage sufficient to increase these herds to reasonable (prior stable) levels must be allocated; especially in critical areas.

8.7 We suggest that BLM carefully follow "Guidelines For The Management of Pronghorn Antelope", 8th Pronghorn Antelope Workshop, Jasper, Alberta, 1978, when planning and conducting actions on antelope habitat.

8.8 In our view proposed actions to improve degraded riparian habitat, even under alternative five, are inadequate for proper management of this extremely important wildlife habitat. Additional fencing of riparian areas should be considered as well as development of a grazing system that will allow limited use after restoration.

Following are some specific comments on game birds which should be considered.

8.9 Page 25, paragraph 2, "Vegetation Manipulation." No mention of compliance with "Guidelines for Maintenance of Sage Grouse Habitat" is made.

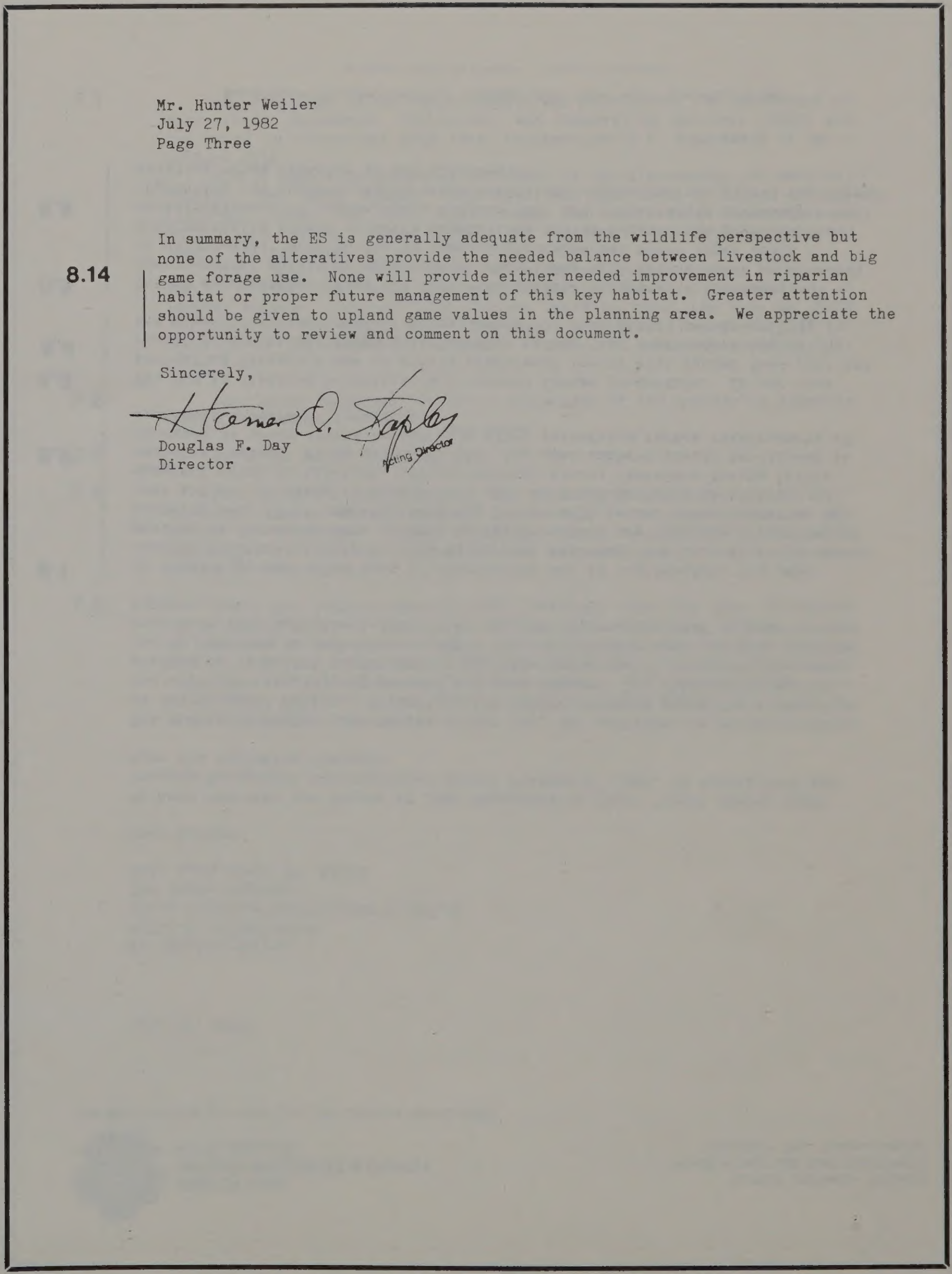
8.10 Page 33, Table 2-5. No mention is made of forest grouse, sage grouse or chukar as to the effects of various alternatives. All are dependent on riparian areas, forbs and grasses associated with meadow areas and impacts should be identified.

8.11 Page 42, paragraph 7, "Recreation Income". Economic benefits of sage grouse hunting should be acknowledged. Failure to recognize economic benefits of upland game is inconsistent with Table 3-11 #13, 14, 15 and Table 3-13.

8.12 Page 70, paragraph 3, "A reduction in sagebrush releases moisture and nutrients for other vegetation production." This is true but it should be recognized that such changes can be very detrimental to wildlife. We would not recommend a decrease below 20 percent canopy cover of sagebrush on sage grouse breeding complexes. (see 1981 Guidelines for Maintenance of Sage Grouse Habitat.)

8.13 Page 72, last paragraph. We are also concerned about sheep use of forbs and cool season grasses in the spring as well as sagebrush use in winter. High nutrient forbs such as lupine and other legumes are important food items for resting hens and young broods. Significant reduction in this vegetation can have negative impacts on sage grouse.

Comment Letter 8



Mr. Hunter Weiler
July 27, 1982
Page Three

8.14 In summary, the ES is generally adequate from the wildlife perspective but none of the alteratives provide the needed balance between livestock and big game forage use. None will provide either needed improvement in riparian habitat or proper future management of this key habitat. Greater attention should be given to upland game values in the planning area. We appreciate the opportunity to review and comment on this document.

Sincerely,

Homer D. Stapley
Acting Director

Douglas F. Day
Director

Response Letter 8

8.1 See Conclusion section, Pages 73-74 of the Draft EIS. On a planning area basis, big game numbers are expected to increase in the long term. This increase would follow development of AMPs and establishment of new active preference after 5-year monitoring studies. However, in some allotments, big game numbers would not increase.

8.2 Your opinion will be considered in the decision-making process. Alternatives 3, 4, and 5 address increases in big game with little or no increase in livestock use.

8.3 BLM is directed to protect vegetation and other resources (i.e., soil, watershed, riparian, etc.) while providing forage for livestock and wildlife. BLM Manual 4410 states that public lands should be managed for multiple uses.

8.4 The analysis indicates that increasing livestock use to active preference would, in fact, exceed current vegetation production and result in rangeland deterioration. The analyses included in the Draft EIS on Page 69, Summary of Short-term Impacts section, and on Page 70, under the Conclusion section, are correct. Adverse impacts from vegetation overutilization would occur on 50 percent of the planning area. In the long term, however, after rangeland improvements were implemented and monitoring studies completed, AUMs would increase, as indicated on Page 70.

8.5 The shifts described on Page 68 of the Draft EIS (i.e., increased grazing pressure) would be expected to reduce grass and increase browse and forbs which, in many cases, are either detrimental or beneficial, depending on the wildlife species.

8.6 It should be noted that livestock grazing would not exceed grazing capacity on any allotment. However, the combined use of livestock and big game would continue to exceed grazing capacity in the short term (up to 5 years) while the monitoring program would be completed. (See Pages 68-69, Short-term Impacts section of the Draft EIS.)

8.7 As stated on Item 12, Page 29 of the Draft EIS, two Memoranda of Understanding involving UDWR will be met prior to development of projects, including implementing any actions on antelope habitat. The guidelines mentioned will be followed where determined to be applicable, as stated in the Memoranda of Understanding.

BLM personnel attend seminars such as the Pronghorn Antelope Workshop in Canada; use these workshops to build a library of current publications; consult with authorities employed in the field, professionals from universities, and consulting firms; and obtain public comments to develop guidelines and planning actions for all resources.

8.8 BLM Manual Section 6740 establishes policy to implement a management system to protect, maintain, and enhance all wetland-riparian areas administered by BLM. Riparian areas which presently or potentially support broad-leaf vegetation in arid and semi-arid ecosystems are of special management concern. A monitoring program would be implemented and, if it were determined that the riparian habitat was not responding to the proposed use, additional fencing and/or a limited grazing system would be implemented through a resource activity plan.

Response Letter 8

8.9 Item 12 of the Standard Design, Construction, and Operation Features section (Page 29 of the Draft EIS) would involve UDWR and would comply with guidelines for maintenance of sage grouse habitat, where applicable.

8.10 Forest grouse and chukar were not identified as significant issues in the scoping process. Change agents of the proposed action under the various alternatives would not adversely affect these small populations; therefore, impacts to these birds were not evaluated in Table 2-5. Impacts to sage grouse are identified in Chapter 4 of the Draft EIS under each alternative.

8.11 While there are economic benefits from sage grouse hunting, those derived from big game hunting are significantly greater. Data shows that for 1975, the Uinta Basin accounted for a total of 98,970 hunter days (UDWR, Utah Big Game Harvest-1975 [1976a]), while total upland game hunting in the Uinta Basin accounted for 2,274 hunter days, with sage grouse making up 135 of these days (UDWR, Utah Upland Game Annual Report-1975 [1976b]). Data also shows that more money is spent for a big game hunter day than for an upland game hunter day.

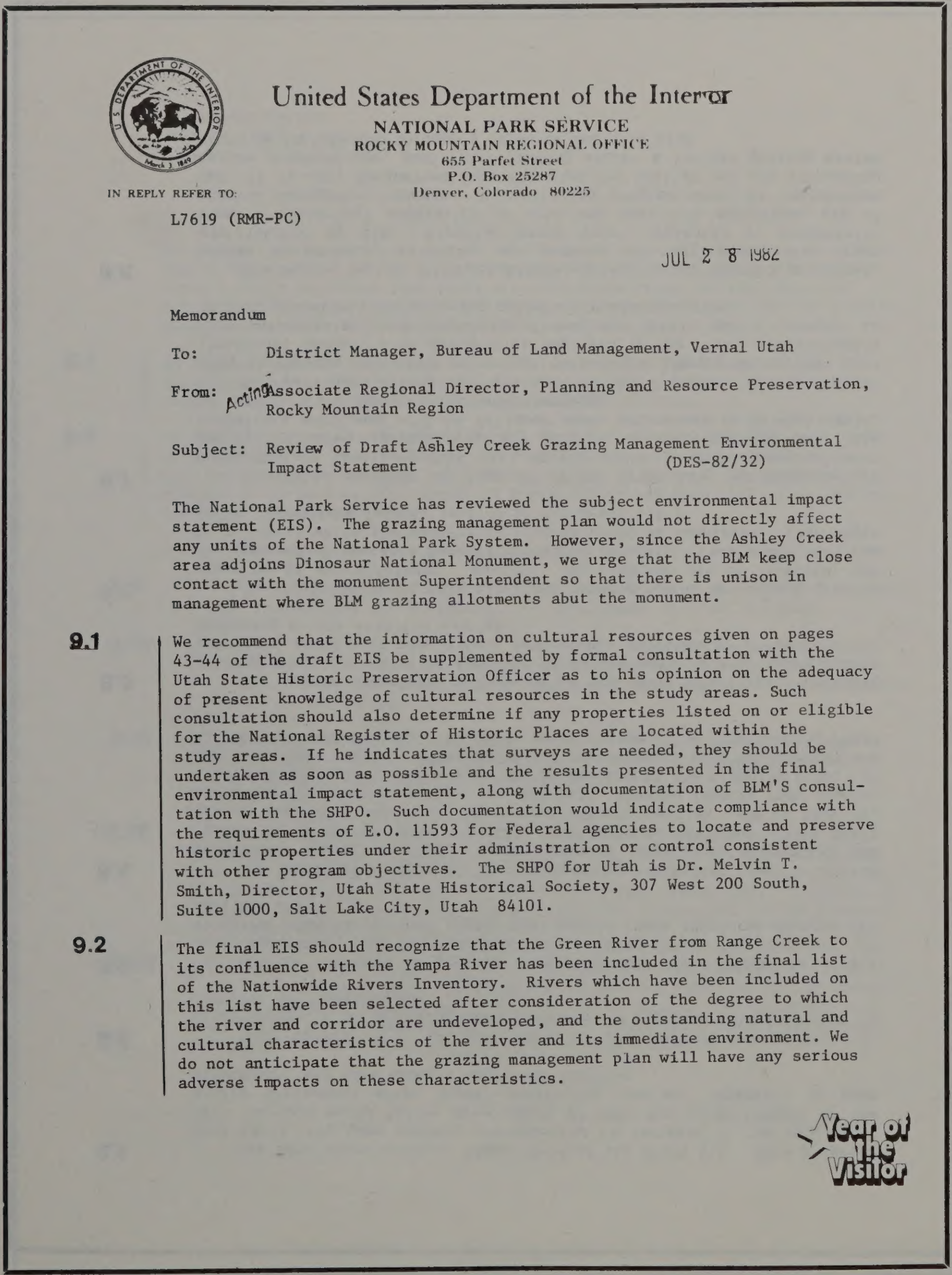
Only those items having the greatest potential economic impact were dealt with in detail in the Draft EIS. However, the text has been amended to acknowledge the economic benefits of upland game hunting (Page 52 of the Draft EIS, second paragraph of Recreation Income section). That paragraph should read: Increasing populations and income are factors influencing demand for all hunting opportunities. Based on the projected population and income increase due to energy development in the Uinta Basin, demands for big game and upland game hunting opportunities in the planning area could increase.

8.12 See Letter Response 8.9. No sage grouse strutting grounds are proposed for vegetation manipulation projects.

8.13 Impacts to sage grouse have been evaluated and discussed for each alternative on the following pages in the Draft EIS: 72, 73, 78, 81, 82, 85, and 88. It should be noted that Alternatives 4 and 5 would not impact sage grouse. Included in the proposed action of each alternative is the implementation of a monitoring program. Because of monitoring, together with the memoranda discussed in Item 12 (Page 29 of the Draft EIS), impacts to sage grouse should be of a short duration. This would limit the extent of adverse impacts.

8.14 See Letter Response 8.8.

Comment Letter 9



March 3 1849

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:
L7619 (RMR-PC)

JUL 2 8 1982

Memorandum

To: District Manager, Bureau of Land Management, Vernal Utah

From: Acting Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Draft Ashley Creek Grazing Management Environmental Impact Statement (DES-82/32)

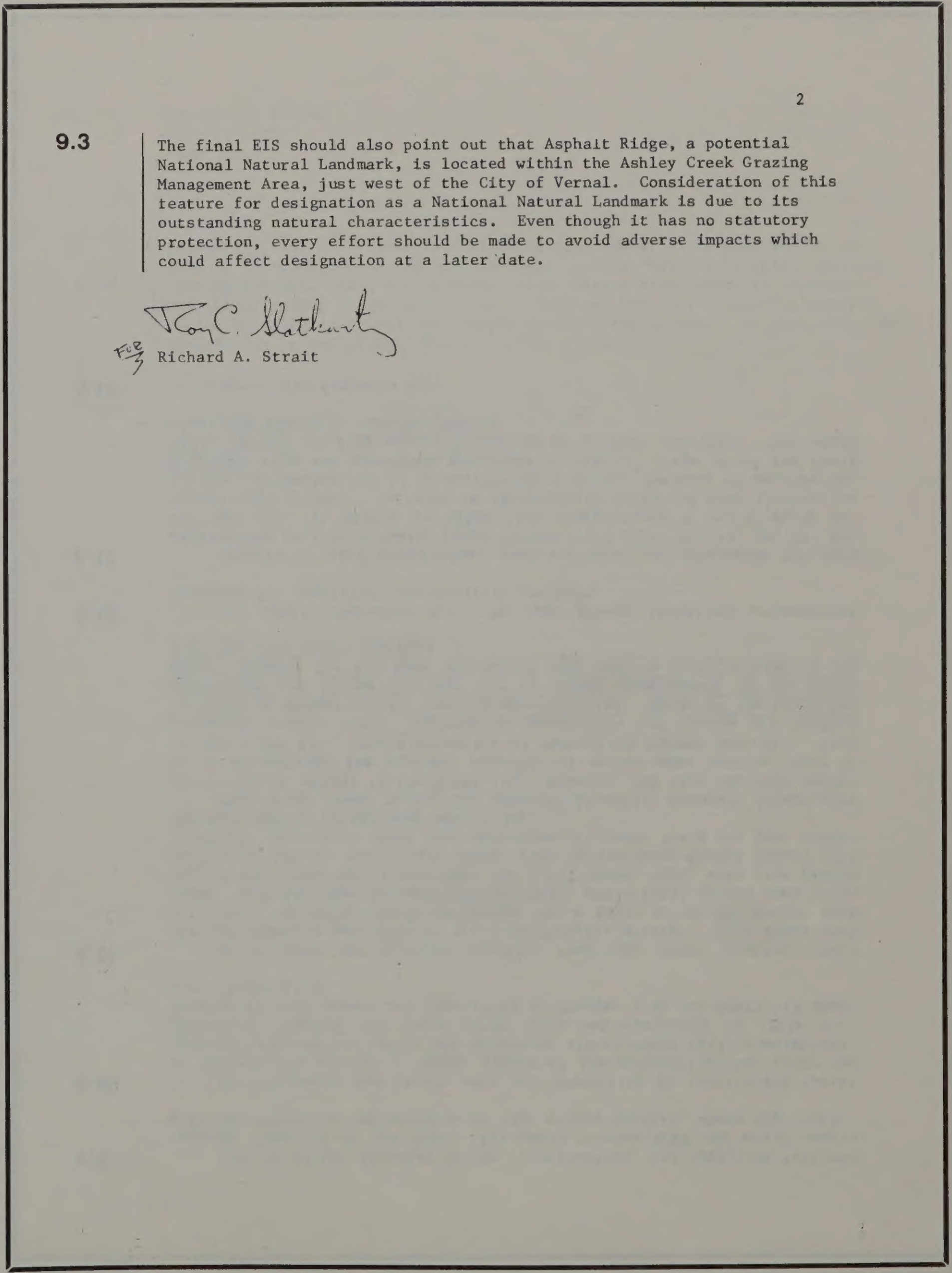
The National Park Service has reviewed the subject environmental impact statement (EIS). The grazing management plan would not directly affect any units of the National Park System. However, since the Ashley Creek area adjoins Dinosaur National Monument, we urge that the BLM keep close contact with the monument Superintendent so that there is unison in management where BLM grazing allotments abut the monument.

9.1 We recommend that the information on cultural resources given on pages 43-44 of the draft EIS be supplemented by formal consultation with the Utah State Historic Preservation Officer as to his opinion on the adequacy of present knowledge of cultural resources in the study areas. Such consultation should also determine if any properties listed on or eligible for the National Register of Historic Places are located within the study areas. If he indicates that surveys are needed, they should be undertaken as soon as possible and the results presented in the final environmental impact statement, along with documentation of BLM'S consultation with the SHPO. Such documentation would indicate compliance with the requirements of E.O. 11593 for Federal agencies to locate and preserve historic properties under their administration or control consistent with other program objectives. The SHPO for Utah is Dr. Melvin T. Smith, Director, Utah State Historical Society, 307 West 200 South, Suite 1000, Salt Lake City, Utah 84101.

9.2 The final EIS should recognize that the Green River from Range Creek to its confluence with the Yampa River has been included in the final list of the Nationwide Rivers Inventory. Rivers which have been included on this list have been selected after consideration of the degree to which the river and corridor are undeveloped, and the outstanding natural and cultural characteristics of the river and its immediate environment. We do not anticipate that the grazing management plan will have any serious adverse impacts on these characteristics.

Year of the Visitor

Comment Letter 9



2

9.3 The final EIS should also point out that Asphalt Ridge, a potential National Natural Landmark, is located within the Ashley Creek Grazing Management Area, just west of the City of Vernal. Consideration of this feature for designation as a National Natural Landmark is due to its outstanding natural characteristics. Even though it has no statutory protection, every effort should be made to avoid adverse impacts which could affect designation at a later date.

For Richard A. Strait

Response Letter 9

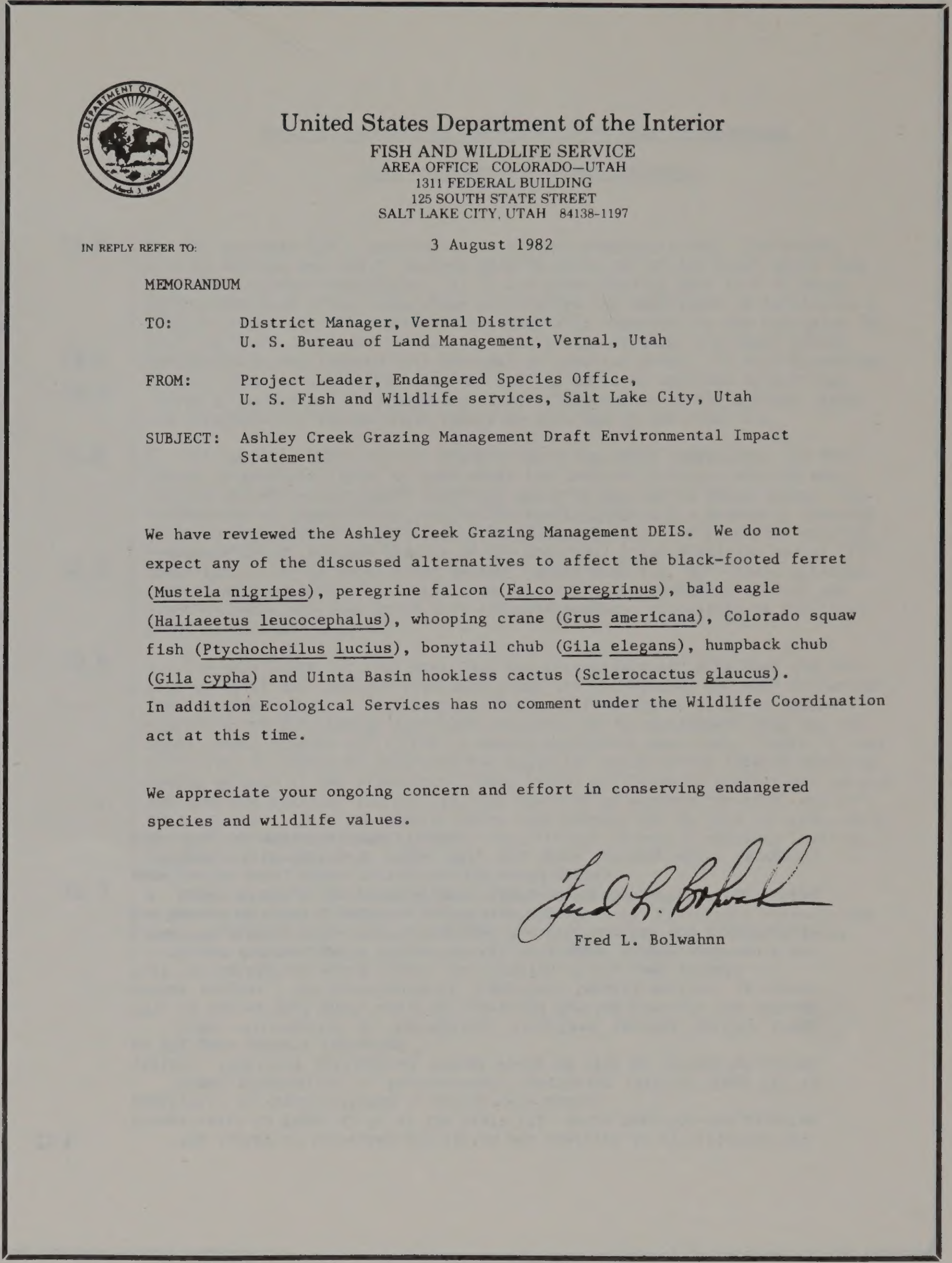
9.1 Formal consultation with the Utah State Historic Preservation Officer has been initiated and is presented in the Draft EIS in Appendix 5, Pages 141-145 (Cultural Resources Memorandum of Understanding, Ashley Creek Grazing Management Environmental Impact Statement Between the Bureau of Land Management and the Utah State Historic Preservation Officer). The need for surveys is recognized, and they would be carried out as stated in both Section III of the Memorandum of Understanding and in protective measure No. 5, contained in the Standard Design, Construction, and Operation Features section of Chapter 2 (Page 28 of the Draft EIS).

Because the actual locations of vegetation manipulation (ground-disturbing) projects have not been specified, it is not possible to conduct inventories of areas to be impacted at this time. The Memorandum of Understanding outlines BLM's proposed method of compliance when an alternative is selected for implementation.

9.2 The Green River was recognized on Page 41 of the Draft EIS as having been included in the final list of the Nationwide Rivers Inventory.

9.3 Alternatives for grazing presented in the Draft EIS are not expected to cause adverse impacts affecting potential Asphalt Ridge National Natural Landmark status.

Comment Letter 10



March 3, 1849

United States Department of the Interior
FISH AND WILDLIFE SERVICE
AREA OFFICE COLORADO—UTAH
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138-1197

IN REPLY REFER TO:

3 August 1982

MEMORANDUM

TO: District Manager, Vernal District
U. S. Bureau of Land Management, Vernal, Utah

FROM: Project Leader, Endangered Species Office,
U. S. Fish and Wildlife services, Salt Lake City, Utah

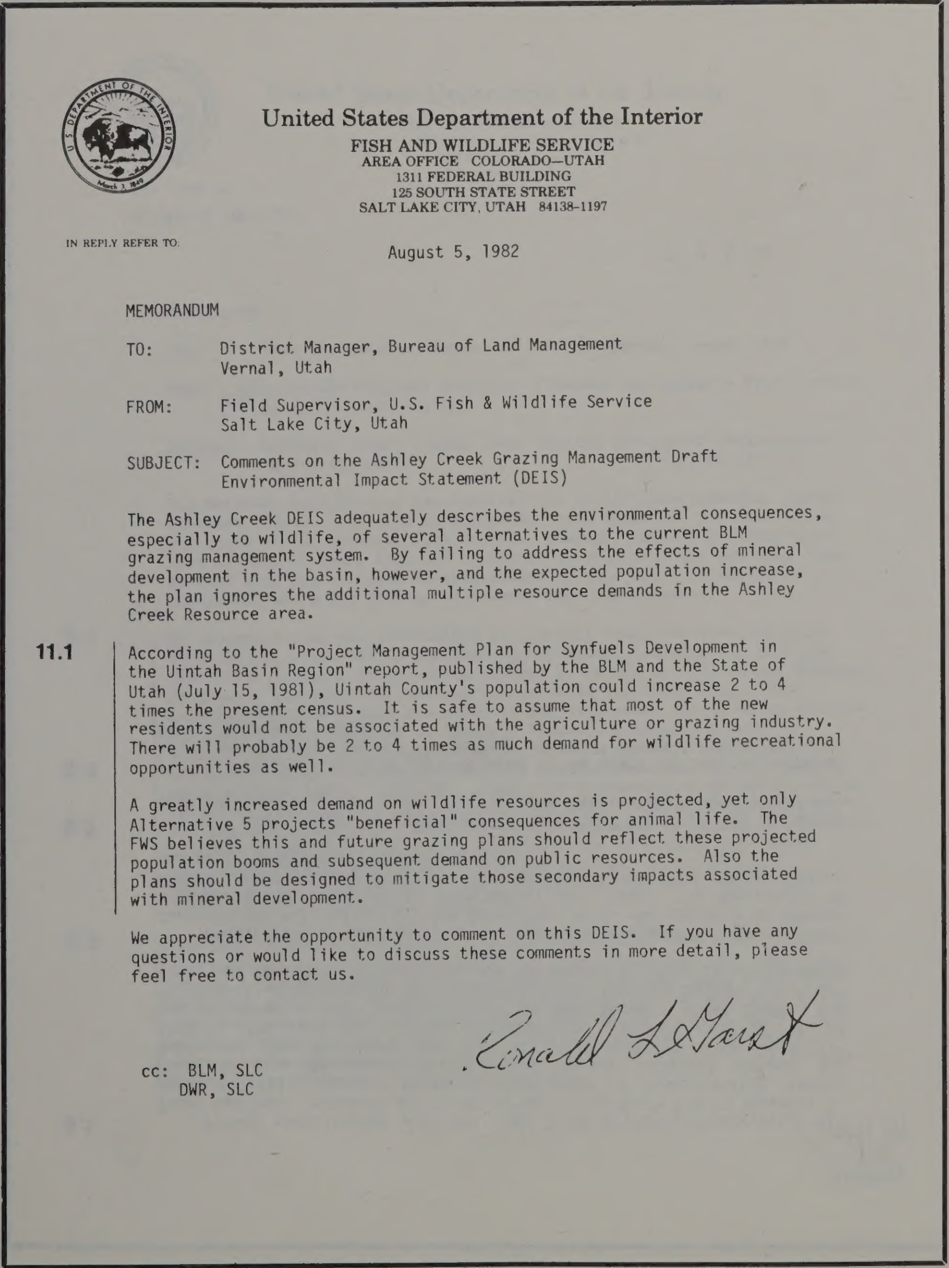
SUBJECT: Ashley Creek Grazing Management Draft Environmental Impact Statement

We have reviewed the Ashley Creek Grazing Management DEIS. We do not expect any of the discussed alternatives to affect the black-footed ferret (Mustela nigripes), peregrine falcon (Falco peregrinus), bald eagle (Haliaeetus leucocephalus), whooping crane (Grus americana), Colorado squaw fish (Ptychocheilus lucius), bonytail chub (Gila elegans), humpback chub (Gila cypha) and Uinta Basin hookless cactus (Sclerocactus glaucus). In addition Ecological Services has no comment under the Wildlife Coordination act at this time.

We appreciate your ongoing concern and effort in conserving endangered species and wildlife values.

Fred L. Bolwahnn

Comment Letter 11



United States Department of the Interior
FISH AND WILDLIFE SERVICE
AREA OFFICE COLORADO—UTAH
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138-1197

IN REPLY REFER TO:

August 5, 1982

MEMORANDUM

TO: District Manager, Bureau of Land Management
Vernal, Utah

FROM: Field Supervisor, U.S. Fish & Wildlife Service
Salt Lake City, Utah

SUBJECT: Comments on the Ashley Creek Grazing Management Draft Environmental Impact Statement (DEIS)

The Ashley Creek DEIS adequately describes the environmental consequences, especially to wildlife, of several alternatives to the current BLM grazing management system. By failing to address the effects of mineral development in the basin, however, and the expected population increase, the plan ignores the additional multiple resource demands in the Ashley Creek Resource area.

11.1 According to the "Project Management Plan for Synfuels Development in the Uintah Basin Region" report, published by the BLM and the State of Utah (July 15, 1981), Uintah County's population could increase 2 to 4 times the present census. It is safe to assume that most of the new residents would not be associated with the agriculture or grazing industry. There will probably be 2 to 4 times as much demand for wildlife recreational opportunities as well.

A greatly increased demand on wildlife resources is projected, yet only Alternative 5 projects "beneficial" consequences for animal life. The FWS believes this and future grazing plans should reflect these projected population booms and subsequent demand on public resources. Also the plans should be designed to mitigate those secondary impacts associated with mineral development.

We appreciate the opportunity to comment on this DEIS. If you have any questions or would like to discuss these comments in more detail, please feel free to contact us.

cc: BLM, SLC
DWR, SLC

Response Letter 11

11.1 The factor of increased population was analyzed in all alternatives. Please refer to Pages 41-42 of the Draft EIS, which describe the expected population increases related to energy development.

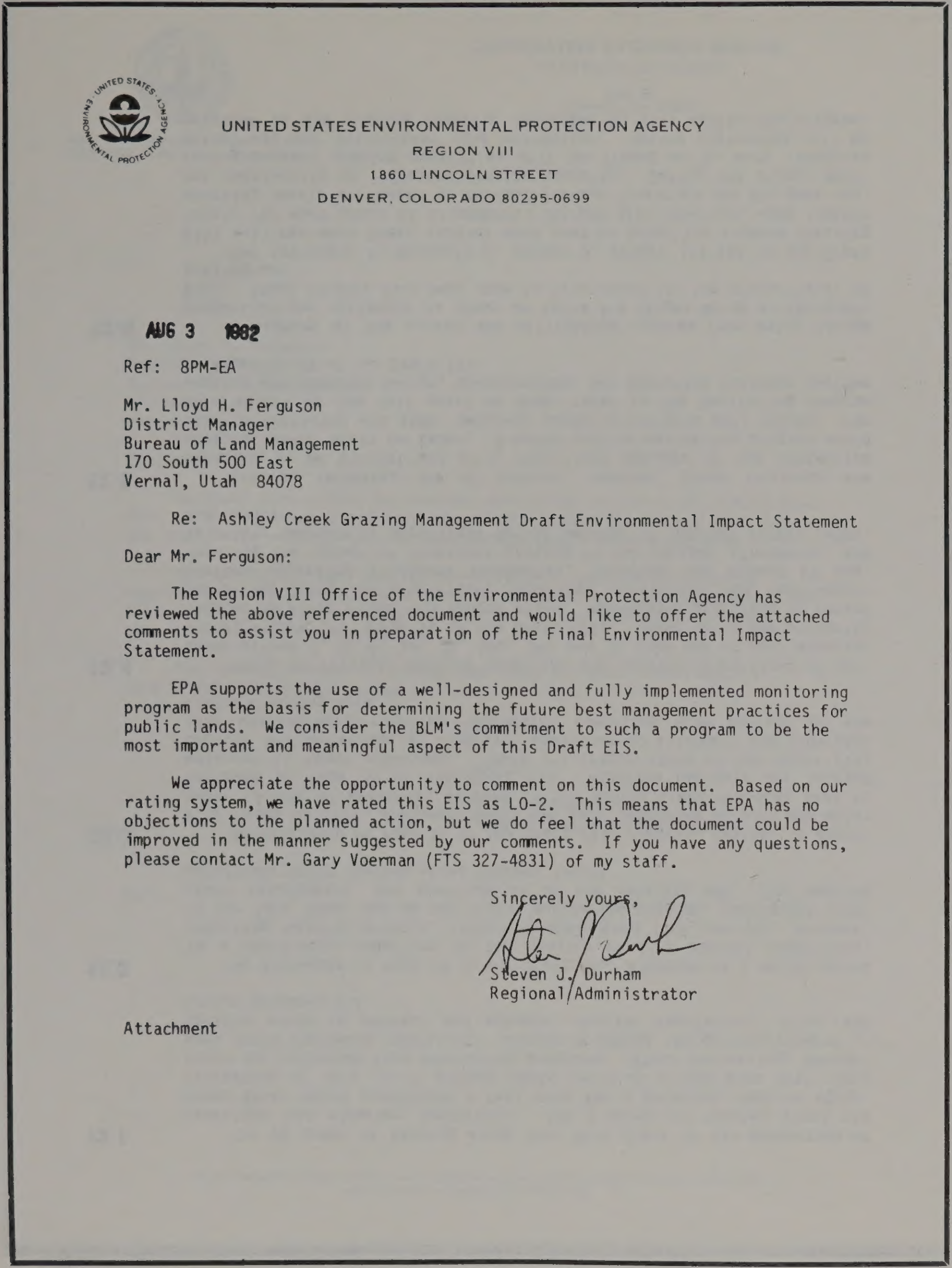
Under Alternative 1, Socioeconomic Conclusion section (Page 75) it states: "Positive attitudinal change would be felt by recreation groups as big game numbers increased."

Under Alternative 2, Recreation, Long-Term Impacts section (Page 79), it states that there would be increased hunting pressure and reduced hunter success. In Socioeconomics, Long-Term Impacts section, it states that recreationists would resent the limiting of big game animals.

Under Alternative 3 (Pages 82-83), big game populations would decline; therefore, a decline in big game hunters' success and a decline in the amount of hunting activity would also occur.

Under Alternative 4 (Page 86), there would be an increase in big game hunter days, which recreationists would approve.

Under Alternative 5 (Page 89), big game hunting would increase, providing increased regional income.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295-0699

AUG 3 1982

Ref: 8PM-EA

Mr. Lloyd H. Ferguson
District Manager
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Re: Ashley Creek Grazing Management Draft Environmental Impact Statement

Dear Mr. Ferguson:

The Region VIII Office of the Environmental Protection Agency has reviewed the above referenced document and would like to offer the attached comments to assist you in preparation of the Final Environmental Impact Statement.

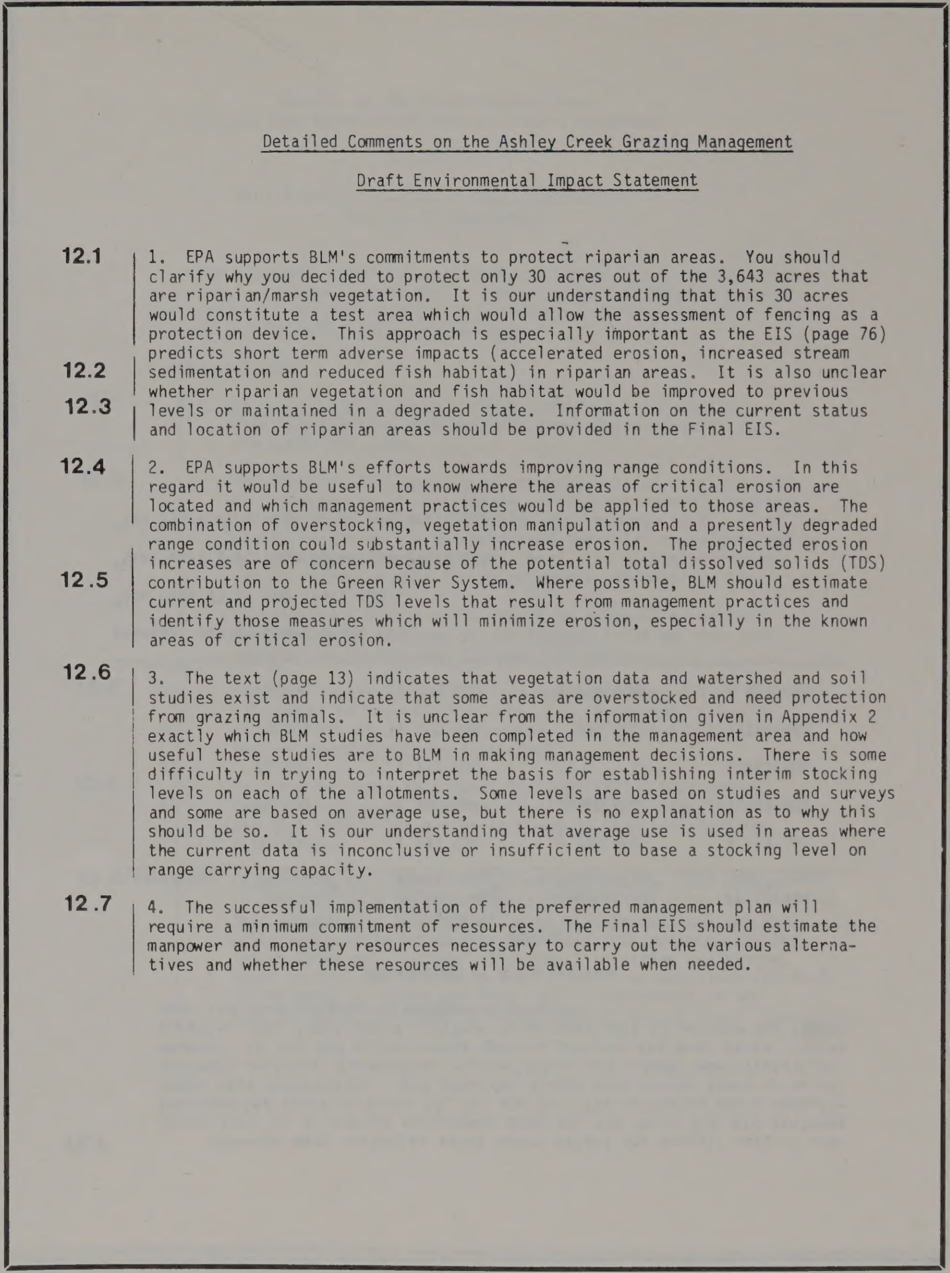
EPA supports the use of a well-designed and fully implemented monitoring program as the basis for determining the future best management practices for public lands. We consider the BLM's commitment to such a program to be the most important and meaningful aspect of this Draft EIS.

We appreciate the opportunity to comment on this document. Based on our rating system, we have rated this EIS as LO-2. This means that EPA has no objections to the planned action, but we do feel that the document could be improved in the manner suggested by our comments. If you have any questions, please contact Mr. Gary Voerman (FTS 327-4831) of my staff.

Sincerely yours,

Steven J. Durham
Regional Administrator

Attachment



Detailed Comments on the Ashley Creek Grazing Management

Draft Environmental Impact Statement

12.1 1. EPA supports BLM's commitments to protect riparian areas. You should clarify why you decided to protect only 30 acres out of the 3,643 acres that are riparian/marsh vegetation. It is our understanding that this 30 acres would constitute a test area which would allow the assessment of fencing as a protection device. This approach is especially important as the EIS (page 76) predicts short term adverse impacts (accelerated erosion, increased stream
12.2 sedimentation and reduced fish habitat) in riparian areas. It is also unclear whether riparian vegetation and fish habitat would be improved to previous
12.3 levels or maintained in a degraded state. Information on the current status and location of riparian areas should be provided in the Final EIS.

12.4 2. EPA supports BLM's efforts towards improving range conditions. In this regard it would be useful to know where the areas of critical erosion are located and which management practices would be applied to those areas. The combination of overstocking, vegetation manipulation and a presently degraded range condition could substantially increase erosion. The projected erosion increases are of concern because of the potential total dissolved solids (TDS)
12.5 contribution to the Green River System. Where possible, BLM should estimate current and projected TDS levels that result from management practices and identify those measures which will minimize erosion, especially in the known areas of critical erosion.

12.6 3. The text (page 13) indicates that vegetation data and watershed and soil studies exist and indicate that some areas are overstocked and need protection from grazing animals. It is unclear from the information given in Appendix 2 exactly which BLM studies have been completed in the management area and how useful these studies are to BLM in making management decisions. There is some difficulty in trying to interpret the basis for establishing interim stocking levels on each of the allotments. Some levels are based on studies and surveys and some are based on average use, but there is no explanation as to why this should be so. It is our understanding that average use is used in areas where the current data is inconclusive or insufficient to base a stocking level on range carrying capacity.

12.7 4. The successful implementation of the preferred management plan will require a minimum commitment of resources. The Final EIS should estimate the manpower and monetary resources necessary to carry out the various alternatives and whether these resources will be available when needed.

12.1 The 25 acres of fencing along Nine Mile Creek is for protection of watershed and riparian vegetation. The 5 acres of fencing along the Green River would constitute a test area for a proposed riparian study. Protection of this small acreage would serve as a test plot until data could be collected from monitoring programs. After monitoring, management could implement additional fencing or adjust the grazing program in certain areas to protect and enhance riparian vegetation. Also, see Letter Response 8.8.

12.2 As discussed on Page 73 in the Draft EIS, Alternative 1 would result in a short-term reduction in the quality of fish habitat conditions, affecting aquatic animals, including endangered fish species. However, in the long term, due to the 5-year monitoring program, subsequent livestock adjustments, and continuation of the existing AMP, fish habitat conditions could improve above present levels.

12.3 As discussed on Page 37 of the Draft EIS, riparian habitat is generally rated as fair, although conditions vary depending on soil and moisture. A map of perennial streams in the Ashley Creek Planning Area is included on Page 57 of the Draft EIS. Riparian habitats are located adjacent to these waterways. Table 3-1 (Pages 45-46 of the Draft EIS) depicts the percentage of riparian vegetation by allotment and indicates that wetland/marsh-riparian vegetation comprises 0.69 percent of the entire planning area.

12.4 Soils in critical erosion condition are located in portions of soil associations 1, 3, 4, 10, 11, 12a, 14, and 16 (see map of soil associations, Figure 3-1, Page 56 of the Draft EIS). These soils are primarily located on steep slopes and Mancos shale. Management practices in recent years resulting in significant watershed protection and improvement include adjusting allotment boundaries, changing the season of use, reducing the number of livestock grazing in the various allotments, and voluntary non-use by permittees during periods of natural stress (USDI, BLM, 1981).

12.5 Erosion increases are of concern; however, these increases are expected to be minimal and of a short term because of the protective measures which would be taken. A water quality monitoring program would also be initiated and other measures taken to minimize soil losses. For more detail on how this would be done, refer to the Monitoring Program section and Standard Design, Construction, and Operation Features section on Pages 27-28 of the Draft EIS.

12.6 A summary of the survey and utilization studies from which forage production was estimated is shown on Table 3-3 (Pages 49-50 of the Draft EIS). These studies have been used to help establish the proper level of grazing use.

The rationale in Appendix 2, column 3, (Pages 111-123 in the Draft EIS) outlines when these studies were used to establish interim stocking levels for each group of allotments. As you also observed, some interim stocking levels are based on current average livestock and big game use, not necessarily on indicated grazing capacity. During the 5-year monitoring period, grazing capacities will be firmed up by more intensive actual use and utilization data collection. Active preference will be adjusted to the grazing capacity indicated by this monitoring program.

12.7 Although many variables exist which affect the overall cost of projects such as a grazing management program, the Draft EIS did estimate the expected costs on Pages 23, 24, and 30. The following table consolidates that information. BLM does not always have enough funds to do all desired projects (vegetation manipulation and range administration); however, it has had a continuous grazing program for many years. It is expected that funds would continue to be available to perform and implement the selected grazing management program.

Total Cost of Alternatives

	Dollars			
Alternative	Initial Stocking[a]	Preparation of AMPs and Monitoring[b]	Vegetation Manipulation[c]	Projected Total Costs
1.	72,000	2,382,500	2,296,800	4,751,300
2.	72,000	2,382,500	3,488,000	5,942,500
3.	72,000	1,775,000	0	1,847,000
4.	72,000	2,090,000	974,400	3,136,400
5.	72,000	1,775,000	1,706,000	3,553,000

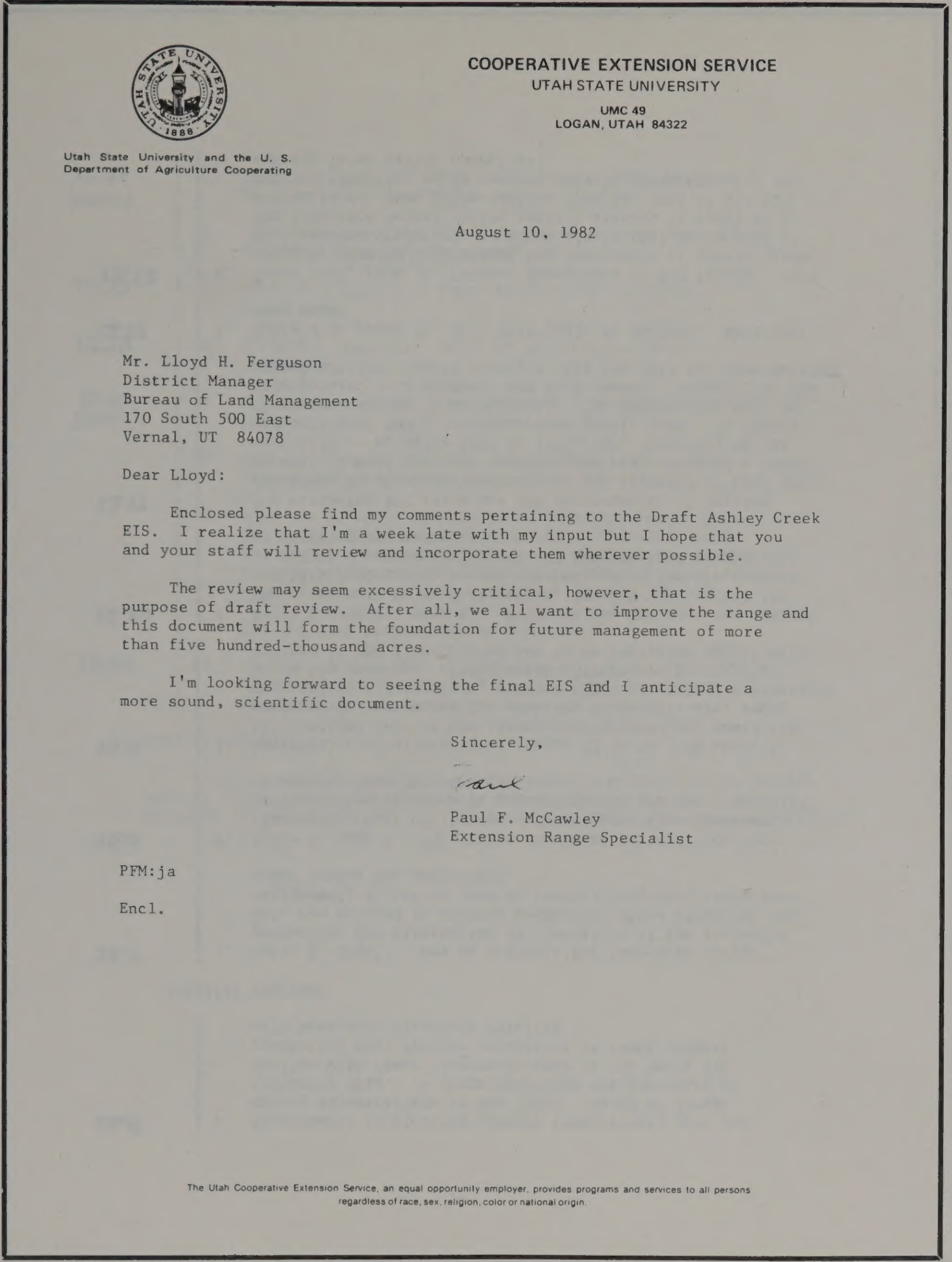
Source: Ashley Creek Draft EIS.

[a] See Page 23 of the Draft EIS.

[b] See Table 2-2, Page 30 of the Draft EIS.

[c] See Table 2-3, Page 30 of the Draft EIS.

Comment Letter 13



COOPERATIVE EXTENSION SERVICE
UTAH STATE UNIVERSITY
UMC 49
LOGAN, UTAH 84322

Utah State University and the U. S.
Department of Agriculture Cooperating

August 10, 1982

Mr. Lloyd H. Ferguson
District Manager
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Lloyd:

Enclosed please find my comments pertaining to the Draft Ashley Creek EIS. I realize that I'm a week late with my input but I hope that you and your staff will review and incorporate them wherever possible.

The review may seem excessively critical, however, that is the purpose of draft review. After all, we all want to improve the range and this document will form the foundation for future management of more than five hundred-thousand acres.

I'm looking forward to seeing the final EIS and I anticipate a more sound, scientific document.

Sincerely,

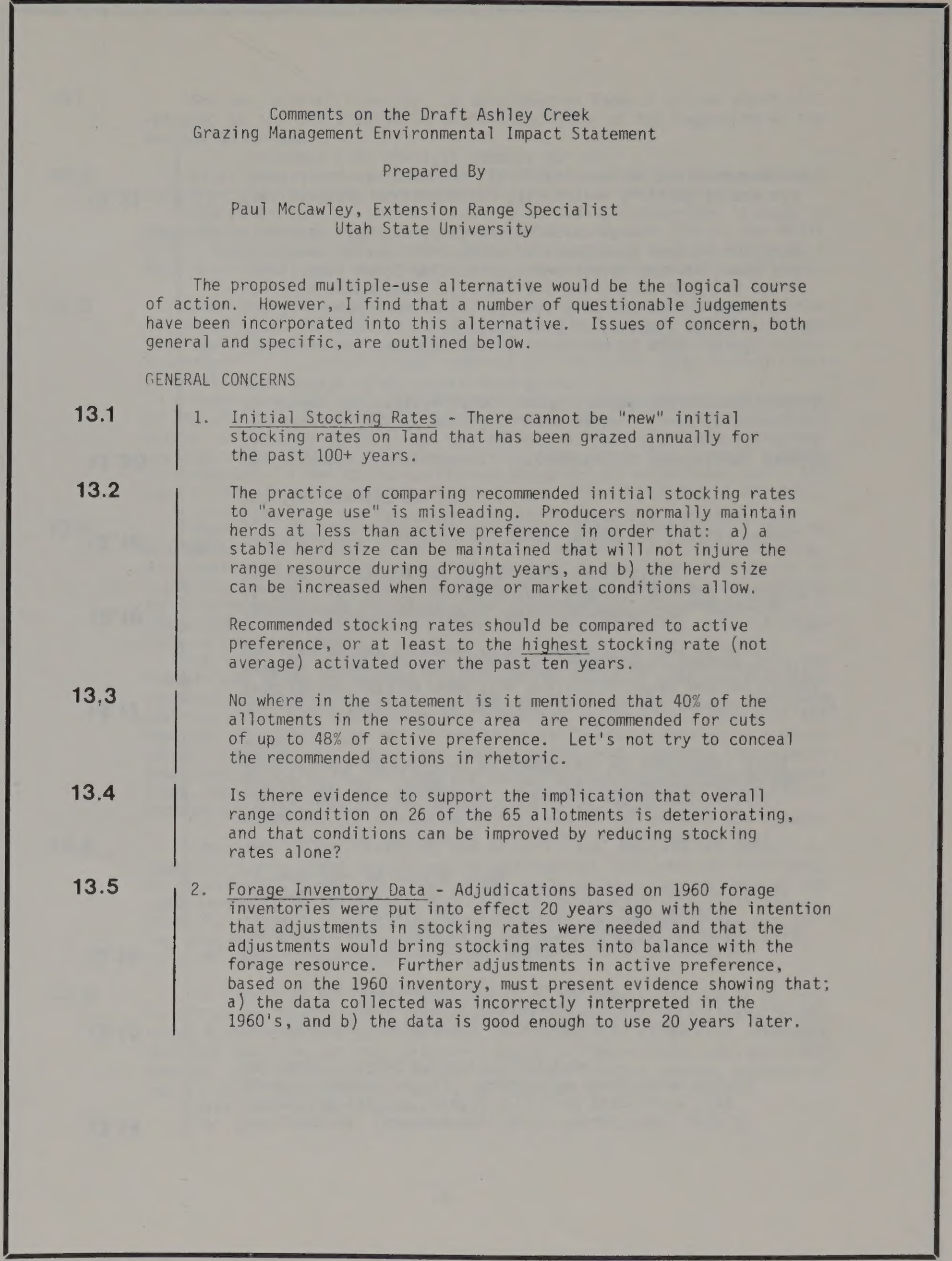
Paul F. McCawley
Extension Range Specialist

PFM:ja

Encl.

The Utah Cooperative Extension Service, an equal opportunity employer, provides programs and services to all persons regardless of race, sex, religion, color or national origin.

Comment Letter 13



Comments on the Draft Ashley Creek
Grazing Management Environmental Impact Statement

Prepared By

Paul McCawley, Extension Range Specialist
Utah State University

The proposed multiple-use alternative would be the logical course of action. However, I find that a number of questionable judgements have been incorporated into this alternative. Issues of concern, both general and specific, are outlined below.

GENERAL CONCERNS

13.1 1. Initial Stocking Rates - There cannot be "new" initial stocking rates on land that has been grazed annually for the past 100+ years.

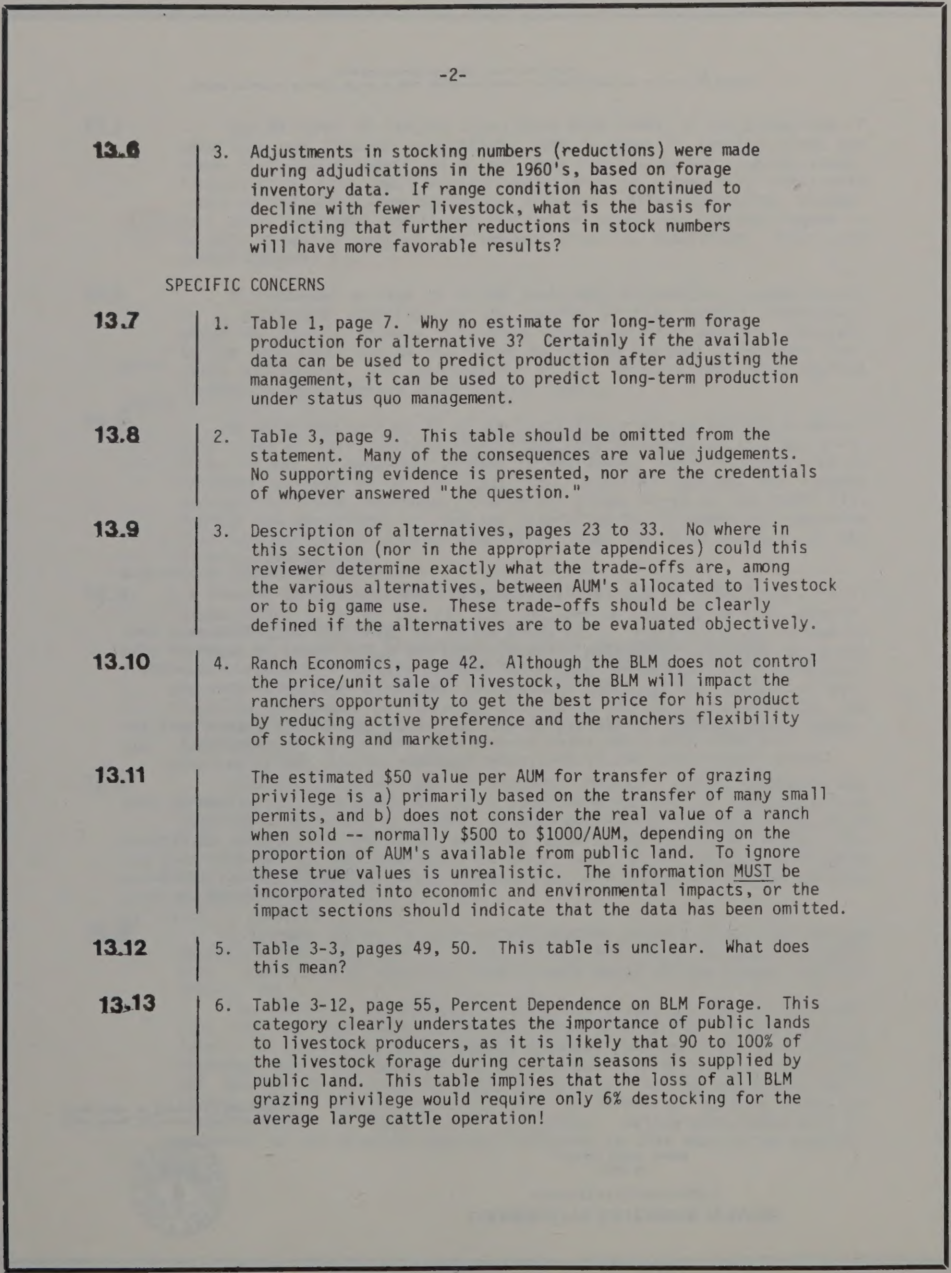
13.2 The practice of comparing recommended initial stocking rates to "average use" is misleading. Producers normally maintain herds at less than active preference in order that: a) a stable herd size can be maintained that will not injure the range resource during drought years, and b) the herd size can be increased when forage or market conditions allow.

Recommended stocking rates should be compared to active preference, or at least to the highest stocking rate (not average) activated over the past ten years.

13,3 No where in the statement is it mentioned that 40% of the allotments in the resource area are recommended for cuts of up to 48% of active preference. Let's not try to conceal the recommended actions in rhetoric.

13.4 Is there evidence to support the implication that overall range condition on 26 of the 65 allotments is deteriorating, and that conditions can be improved by reducing stocking rates alone?

13.5 2. Forage Inventory Data - Adjudications based on 1960 forage inventories were put into effect 20 years ago with the intention that adjustments in stocking rates were needed and that the adjustments would bring stocking rates into balance with the forage resource. Further adjustments in active preference, based on the 1960 inventory, must present evidence showing that; a) the data collected was incorrectly interpreted in the 1960's, and b) the data is good enough to use 20 years later.



13.6 3. Adjustments in stocking numbers (reductions) were made during adjudications in the 1960's, based on forage inventory data. If range condition has continued to decline with fewer livestock, what is the basis for predicting that further reductions in stock numbers will have more favorable results?

SPECIFIC CONCERNS

13.7 1. Table 1, page 7. Why no estimate for long-term forage production for alternative 3? Certainly if the available data can be used to predict production after adjusting the management, it can be used to predict long-term production under status quo management.

13.8 2. Table 3, page 9. This table should be omitted from the statement. Many of the consequences are value judgements. No supporting evidence is presented, nor are the credentials of whoever answered "the question."

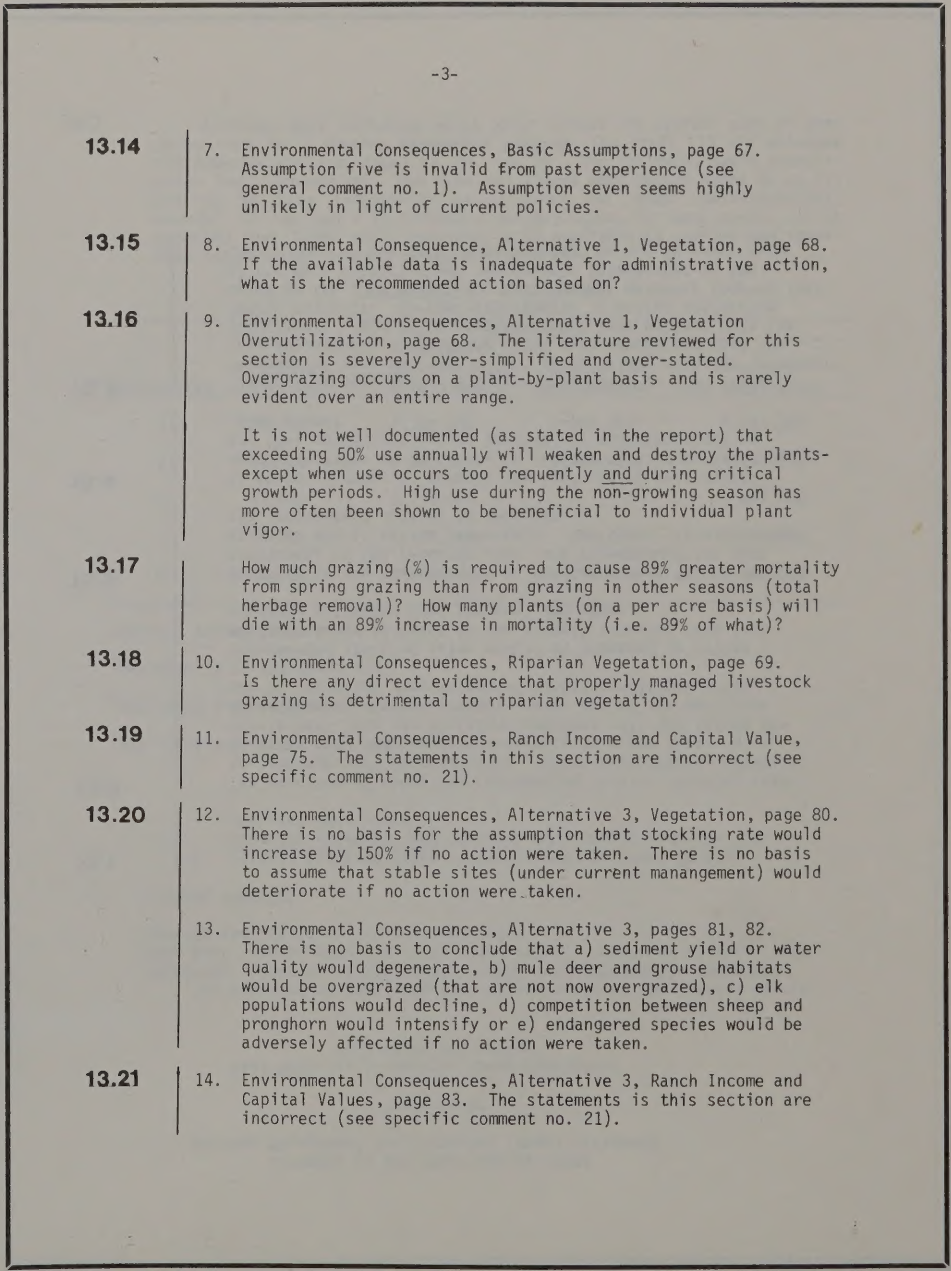
13.9 3. Description of alternatives, pages 23 to 33. No where in this section (nor in the appropriate appendices) could this reviewer determine exactly what the trade-offs are, among the various alternatives, between AUM's allocated to livestock or to big game use. These trade-offs should be clearly defined if the alternatives are to be evaluated objectively.

13.10 4. Ranch Economics, page 42. Although the BLM does not control the price/unit sale of livestock, the BLM will impact the ranchers opportunity to get the best price for his product by reducing active preference and the ranchers flexibility of stocking and marketing.

13.11 The estimated $50 value per AUM for transfer of grazing privilege is a) primarily based on the transfer of many small permits, and b) does not consider the real value of a ranch when sold -- normally $500 to $1000/AUM, depending on the proportion of AUM's available from public land. To ignore these true values is unrealistic. The information MUST be incorporated into economic and environmental impacts, or the impact sections should indicate that the data has been omitted.

13.12 5. Table 3-3, pages 49, 50. This table is unclear. What does this mean?

13.13 6. Table 3-12, page 55, Percent Dependence on BLM Forage. This category clearly understates the importance of public lands to livestock producers, as it is likely that 90 to 100% of the livestock forage during certain seasons is supplied by public land. This table implies that the loss of all BLM grazing privilege would require only 6% destocking for the average large cattle operation!



13.14 7. Environmental Consequences, Basic Assumptions, page 67. Assumption five is invalid from past experience (see general comment no. 1). Assumption seven seems highly unlikely in light of current policies.

13.15 8. Environmental Consequence, Alternative 1, Vegetation, page 68. If the available data is inadequate for administrative action, what is the recommended action based on?

13.16 9. Environmental Consequences, Alternative 1, Vegetation Overutilization, page 68. The literature reviewed for this section is severely over-simplified and over-stated. Overgrazing occurs on a plant-by-plant basis and is rarely evident over an entire range.

It is not well documented (as stated in the report) that exceeding 50% use annually will weaken and destroy the plants-except when use occurs too frequently and during critical growth periods. High use during the non-growing season has more often been shown to be beneficial to individual plant vigor.

13.17 How much grazing (%) is required to cause 89% greater mortality from spring grazing than from grazing in other seasons (total herbage removal)? How many plants (on a per acre basis) will die with an 89% increase in mortality (i.e. 89% of what)?

13.18 10. Environmental Consequences, Riparian Vegetation, page 69. Is there any direct evidence that properly managed livestock grazing is detrimental to riparian vegetation?

13.19 11. Environmental Consequences, Ranch Income and Capital Value, page 75. The statements in this section are incorrect (see specific comment no. 21).

13.20 12. Environmental Consequences, Alternative 3, Vegetation, page 80. There is no basis for the assumption that stocking rate would increase by 150% if no action were taken. There is no basis to assume that stable sites (under current manangement) would deteriorate if no action were taken.

13. Environmental Consequences, Alternative 3, pages 81, 82. There is no basis to conclude that a) sediment yield or water quality would degenerate, b) mule deer and grouse habitats would be overgrazed (that are not now overgrazed), c) elk populations would decline, d) competition between sheep and pronghorn would intensify or e) endangered species would be adversely affected if no action were taken.

13.21 14. Environmental Consequences, Alternative 3, Ranch Income and Capital Values, page 83. The statements is this section are incorrect (see specific comment no. 21).

Comment Letter 13

-4-

13.21 (cont.)

15. Table 4-3, page 93. The information in this table is incorrect (see specific comment no. 21).

16. Table 4-6, page 94. The information in this table is incorrect (see specific comment no. 21).

13.22

17. Table 4-7, page 95. There is no basis for these predictions.

13.23

18. Table 4-8, page 96. There is no basis for these predictions.

13.21 (cont.)

19. Table 4-9, page 96. The information in this table is incorrect (see specific comment no. 21).

20. Table 4-13, page 98. The information in this table is incorrect (see specific comment no. 21).

21. Appendix 6, Table 4, page 150. There is virtually no change in actual amounts "Returned to the Land" under the various "% change" columns. I question the arithmetic in this entire economic evaluation. Other columns also contain errors, as do other tables in this appendix.

Did the same person compile Appendix 4?

13.24

22. Appendix 6, page 147-151. Basing changes in herd size on "Dependence on BLM Forage" (page 55) is unrealistic and unacceptable (see specific comment no. 6).

OVERALL CONCERNS

This statement is poorly documented with literature and supporting data is filled with value judgements and misinterpretations. This document is unacceptable as the foundation for future management decisions.

Response Letter 13

13.1 The new initial stocking, as described on Page 23 of the Draft EIS, referred to the stocking which would be allowed at the beginning of the monitoring period.

13.2 Also, some permittees license less than active preference because they feel that the rangeland cannot sustain active preference.

The comparison of initial stocking to active preference is made in Appendix 3, Tables 1 and 3 (Pages 125, 126, 129, and 130 of the Draft EIS). Average use is used for comparison purposes because it is felt that that level has resulted in the present on-the-ground conditions.

13.3 When all allotments are added together, the results do not define the effects to individual permittees. The EIS has been written so that each permittee can determine the actual stocking on an allotment basis. Appendices 1, 2, and 3 (Pages 109-134 of the Draft EIS) contain this information.

Under Alternative 1, the proposed action, 25 allotments (38 percent of the planning area's 65 allotments) would have initial stocking below active preference during the monitoring period. However, livestock grazing would initially increase 10,651 AUMs above the present average licensed use. A new active preference would not be established until the end of the 5-year monitoring period (see Page 28 of the Draft EIS).

13.4 There is no implication that overall range condition on the 26 allotments listed under Items 1 and 2 in Appendix 3 is deteriorating. Available data does indicate that average use on these allotments is close to grazing capacity. The rationale used in determining stocking during the monitoring period is given in Appendix 2, Recommendations 1.1 (Page 113), 1.2 (Page 114), 2.1 (Page 117), 2.2 (Page 117), and 2.3 (Page 117) in the Draft EIS.

It is a well established principle of rangeland management that the numbers and kinds of animals grazed must be balanced with the rangeland resource (Stoddard, 1975). In some cases, a reduction of livestock numbers alone can achieve proper rangeland utilization. However, BLM does not propose to use only a reduction in livestock grazing to achieve proper utilization. Rangeland developments and improved management practices will also be initiated and outlined in the allotment management plan, as stated in the Management Level and Vegetation Manipulation section of each alternative (see Chapter 2 in the Draft EIS).

13.5 The 1960 forage inventory was used in the analysis of impacts to vegetation only where actual use or utilization data was not available. No adjustments (under any alternative) would be based exclusively on the 1960 inventory or existing actual use and utilization data. All adjustments in active preference would be based on the results of the monitoring program, along with previous rangeland management studies, as outlined on Pages 27 and 28 of the Draft EIS.

13.6 As discussed in Letter Response 13.5, no adjustments would be made in active preference until monitoring was completed. If it were determined that rangeland condition was declining, all aspects of livestock and big game use of the allotment would be taken into consideration. However, monitoring could indicate that the livestock season, pattern of use, or distribution might need to be modified or numbers reduced.

Also, see Letter Response 3.4.

13.7 Long-term forage production estimates were made only where vegetation manipulation (i.e., chaining, burning, spraying, etc.), is proposed. Adequate documentation exists to predict forage production based on data collected and studies conducted on past vegetation manipulation projects in the planning area (see Pages 69 and 70 of the Draft EIS).

No prediction was made of increases in forage production through grazing management. Because no vegetation manipulation is proposed for Alternative 3, there is no prediction of long-term increases in forage production.

13.8 The source of the Summary Table is Table 2-5 (Page 33 of the Draft EIS). Conclusions for these tables were based on the environmental consequences analyzed in Chapter 4. These consequences were arrived at using an interdisciplinary team approach. The Summary Table is provided for a quick evaluation and comparison of alternatives in the EIS.

13.9 Appendix 3 (Pages 125-134 in the Draft EIS) provides AUMs initially used for livestock and big game for each of the alternatives by allotment. For example, in Argyle Ridge, Alternative 1, initial stocking would not change from the average licensed use for livestock (column 4) or present big game use (column 5). However, columns 6 to 9 show the proposed changes in livestock AUMs from active preference (-160) and for big game: AUMs for deer would be 132 less than prior stable levels; antelope AUMs would not change; and elk AUMs would be reduced by 507 under this alternative.

13.10 Refer to Page 42, first paragraph of Ranch Economics section in the EIS.

13.11 The $50/AUM figure is an estimated average for the Uinta Basin area, based on recent sales.

The $500-$1,000 figure mentioned in your comment appears to be for an animal unit which is the amount of feed it takes to feed a cow for 1 year. An animal unit month is the amount of feed it takes to feed a cow for 1 month.

The real value of a ranch when sold may be influenced by the accompanying BLM permits (i.e., the quality and quantity of the BLM permits in proportion to the size of the ranch and other public grazing lands). These factors are different for each ranch and cannot be considered in the analysis required in the Draft EIS. Given the complexity of the problem, the methods of evaluating impacts to ranch capital are considered by agricultural economists, agricultural finance people, and ranchers as a reasonable indicator of possible impacts.

13.12 Table 3-3 is a summary of forage production, forage use, and average utilization. Because the data based on the 1960 survey and current monitoring studes varies, columns 1 and 2 give livestock grazing capacity for both. The table may seem unclear because the amount of forage determined from the 1960 survey and the amount determined from utilization studies are not the same or even close. Column 3, the competitive use column, estimates the amount of forage used on an annual basis by both livestock and big game in AUMs. Column 4, average annual utilization, averages forage utilization over a period of time, varying from 1 to 5 or more years.

13.12 (cont.) The purpose of the table is to show how grazing use compares to grazing capacity as indicated by all available studies. It also provides a basis for the evaluation of impacts to vegetation.

13.13 The ranch budgets, including the dependency figures, were calculated by the U.S. Department of Agriculture, Economics, Statistics, and Cooperative Services (1981), based on interviews with permittees on the Ashley Creek Planning Area.

If a permittee is dependent to any degree on his BLM permit and that permit is reduced, he has basically three options: (1) buy feed to replace the AUMs lost; (2) reduce herd size to match the total feed remaining after the cut in AUMs; or (3) some combination of 1 and 2. The opposite is true if his permit increases. (There are many other options that might be considered, depending on the assumptions used.)

Based on experience with other EISs and in consultation with agricultural economists and ranchers, it was decided that the assumption that changes would be made in herd size was a realistic and acceptable method of calculating economic impacts in an EIS.

It is assumed that the permittees interviewed by the ESCS considered these factors when providing the dependency figures referred to.

13.14 See Letter Comment 13.1. It would be impossible to make any analysis without this assumption. We must assume that the proposed action and changes for each alternative would occur in order to show a "from-to" relationship between the existing condition and what is expected to occur.

13.15 The analyses in the Draft EIS are based on available data (the 1960 range survey and monitoring studies conducted over the past 5-20 years). Administrative action must be backed by data which can be supported in a legal action. At this time, BLM does not feel that the available data base is adequate for administrative action. The proposed action (Alternative 1) would be to stock at the alternative level with the permittees cooperation during the 5-year monitoring program. Following that program, active preference could be adjusted (administrative action), and those grazing capacities could be legally defended (see Pages 27-28 of Draft EIS).

13.16 It is not the intent of the EIS to provide a literature review of the science of rangeland management, but to describe the rationale and strategy used to analyze expected impacts. The literature reviewed for the analyses of impacts to vegetation, although simplified, has not been misstated. The literature reviewed nearly exhausts academic contributions that are useful in making rangeland management decisions. Overgrazing does occur on a plant-by-plant basis: this is why the most palatable plants are reduced in composition which, in turn adversely affects rangeland condition and forage production.

The concepts in Chapter 2 are: (1) vegetation utilization over 50 percent weakens plants; (2) reduced vigor is an early indicator of overutilization; and (3) spring use causes more severe plant damage than grazing during other seasons.

Analysis shows that some allotments are utilized at levels over 50 percent and that more than 90 percent of the allotments are grazed in the spring. These conditions do not fit into the category where high use should be recommended.

13.17 The study quoted was published by Utah State University under the direction of C. W. Cook (1971). Dr. Cook was working with three intensities of grazing percentages: 25, 50, and 75. His text is reprinted below.

> Season of Harvesting
>
> The season of harvesting desert range plants had significant effects (P<.01) upon the yield and vigor of plants... Spring clipping was considerably more detrimental to the plants than either early or late winter clipping or fall clipping. Clipping in the spring, when plants were actively growing, gave higher yields the first year than the other three seasons. By the third year, however, spring-clipped plants yielded substantially less (P<.05) forage than plants harvested during the dormant seasons of fall and winter. Yields did not vary noticeably among the plants clipped during fall or early and late winter.
>
> Without exception, spring clipping reduced twig length and seedstalk production and caused a larger portion of the plants to die in each species....Clipping in the spring caused about 89 percent more death loss of plants and about 54 percent greater crown reduction in living plants than other seasons of harvesting. There were no significant differences (P<.05) among the average death losses from fall, early winter, and late winter harvesting. Black sagebrush, for example, after 3 years of spring utilization produced only about one-twentieth as many seedstalks, which were only one-third as long when compared to unclipped control plants. Likewise, average twig length over the entire plant was reduced by about one-third and dead cover increased to 50 percent more than the controls.
>
> The interaction between season and intensity of harvesting was statistically significant (P<.05). Yield and vigor data over all seasons showed that 75 percent utilization was more detrimental than either 25 or 50 percent utilization. However, 75 percent utilization was far more detrimental during the spring than during the other three periods. In most cases there were significant differences between each of the three intensities of grazing during the spring season, but during other seasons, only the 75 percent utilization was significantly detrimental.
>
> This apparently points out the danger of grazing winter ranges too late in spring. Grazing desert species at 50 percent or more during this season reduced both yield and vigor significantly (P<.05) over the 3 years of treatment.

13.18 Streams and adjacent habitats compose the most productive ecosystem within the rangeland classification. Since livestock concentrate along these streamside zones, excessive use often results (Platts, 1978).

Hormay (1970) believes that the assumption that plants can be grazed at a proper level through regulation of stocking is unrealistic because of the grazing habits of livestock. Livestock graze the more palatable

13.18 plants and accessible areas closely and, invariably, beyond the proper use level. Therefore, under continuous grazing at any stocking level, the more palatable and accessible plants are gradually killed out. Unfortunately, the best plants and best grazing sites are destroyed first.

Several authors such as Lurz, Duff, and Marcuson, as referenced by Platts (1978), all reported reduced vegetation and more unstable streambanks occurring in grazed areas; however, public rangelands must be managed on a multiple-use basis.

According to Platts (1978) the solution to this complex problem is not to argue whether or not livestock grazing degrades riparian and aquatic systems, but to identify and develop grazing systems compatible with fishery and riparian habitats. It is extremely difficult to identify any widely used grazing strategy compatible with the environmental needs of the stream. Meehan, as referenced by Platts (1978), states that the task of modifying existing grazing strategies or developing new strategies that would have environmental compatibility would be difficult. Furthermore, the fishery biologist must assist in this difficult task to develop land management strategies insuring proper management of riparian and aquatic zones.

13.19 The data relative to ranch budgets has been examined and modified to reflect the changes suggested in Letter Comment 7.1. See Appendix A, Tables 11-14 in the Final EIS.

13.20 See Letter Response 13.14. This assumption is necessary because permittees on some allotments would be grazing at active preference under Alternative 3. BLM must analyze the results of this action should it occur. Current analysis does indicate that this increase would overutilize vegetation on allotments grazed at active preference. This would result in the impacts stated in Item 13 of your comment. However, it should be noted that overutilization would not occur on all allotments at this alternative level (active preference). See Table 4-7, Page 95 of the Draft EIS: the four allotments with AMPs in column 1 and the four allotments with AMPs in column 3 would probably be stocked at near the rangeland's grazing capacity. The remaining 57 allotments would be expected to experience some overutilization.

13.21 See Letter Response 13.19.

During the preparation of the Draft EIS, it was necessary to recompute the budgets for the medium and large cattle operations. The errors in Tables 4 and 5 of Appendix 6 evidently occurred during this operation due to a procedural, not arithmetical error.

Several figures in Appendices 4 and 6 in the Draft EIS appear to be off by 1 unit. This is due to independent rounding during calculation. The tables of Appendix 6 have been modified (see Letter Response 7.1) and are presented as Appendix A of this document.

13.22 Tables 4-1, 4-4, 4-7, and 4-10 are a comparison of the different levels of use under each alternative, using the estimated grazing capacities from either the current monitoring studies or the 1960 range survey. However, these studies are not conclusive; consequently, BLM proposes to make only temporary adjustments. A 5-year monitoring program would be initiated under each alternative, with the exception of Alternative 3, No Action.

Response Letter 13

13.23 Table 4-8 compares active preference with the predicted level of forage production.

13.24 See Letter Response 13.13.

Comment Letter 14

1896

STATE OF UTAH
OFFICE OF THE STATE PLANNING COORDINATOR

SCOTT M. MATHESON,
GOVERNOR

MARTHE F. DYNER,
STATE PLANNING COORDINATOR

August 20, 1982

Mr. Lloyd H. Ferguson
District Manager
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

Dear Mr. Ferguson:

Subject: UT820611-010 DOI/BLM Ashely Creek Grazing Management EIS.

Enclosed are the State Of Utah's consolidated comments regarding this item. If you have any questions, please feel free to call Hunter Weiler, Natural Resource analyst, State Planning Coordinator's office, 801-533-4970.

Thank you,

Marthe F. Dyner

Marthe F. Dyner
State Planning Coordinator

/dr

116 STATE CAPITOL BLDG. • SALT LAKE CITY, UTAH 84114 • (801) 533-5245

August 11, 1982

STATE OF UTAH COMMENTS

DRAFT ASHLEY CREEK GRAZING MANAGEMENT

ENVIRONMENTAL IMPACT STATEMENT

The State has reviewed the Bureau of Land Management's Draft Ashley Creek Grazing Management Environmental Impact Statement and has the following comments:

The Environmental Impact Statement is well written and addresses the pertinent issues. It is generally adequate from both the livestock and wildlife perspective, but none of the alternatives present a balanced resource allocation program that meets the needs of the various resources.

The proposed action (Alternative 1, Multiple Use Alternative) does not appear to be a balanced multiple use management action. The proposed initial stocking rate of 33,399 AUM's for livestock represents a 47 percent increase over present three year average licensed use and is over 2,000 AUM's higher than the recommended initial stocking under Alternative 2, Livestock Forage Recommendation. The proposed initial stocking rate for big game of 10,831 AUM's is 4 percent over present use.

In Chapter 4, Environmental Consequences, it indicates that the proposed action would have an adverse impact on several resources. The proposed initial allocation of 44,229 AUM's for big game and livestock is 33 percent above the present average use and 4,000 AUM's above the estimated current grazing capacity. This is also higher than the estimated 40,000 AUM's, which will be available at the end of the fifth year. This will result in a decline in plant vigor and a decrease in plant growth and reproduction.

Under the proposed action, it indicates that in locations where ecological condition is advancing towards climax, that condition would begin to decline or become static and ecological succession could be reversed.

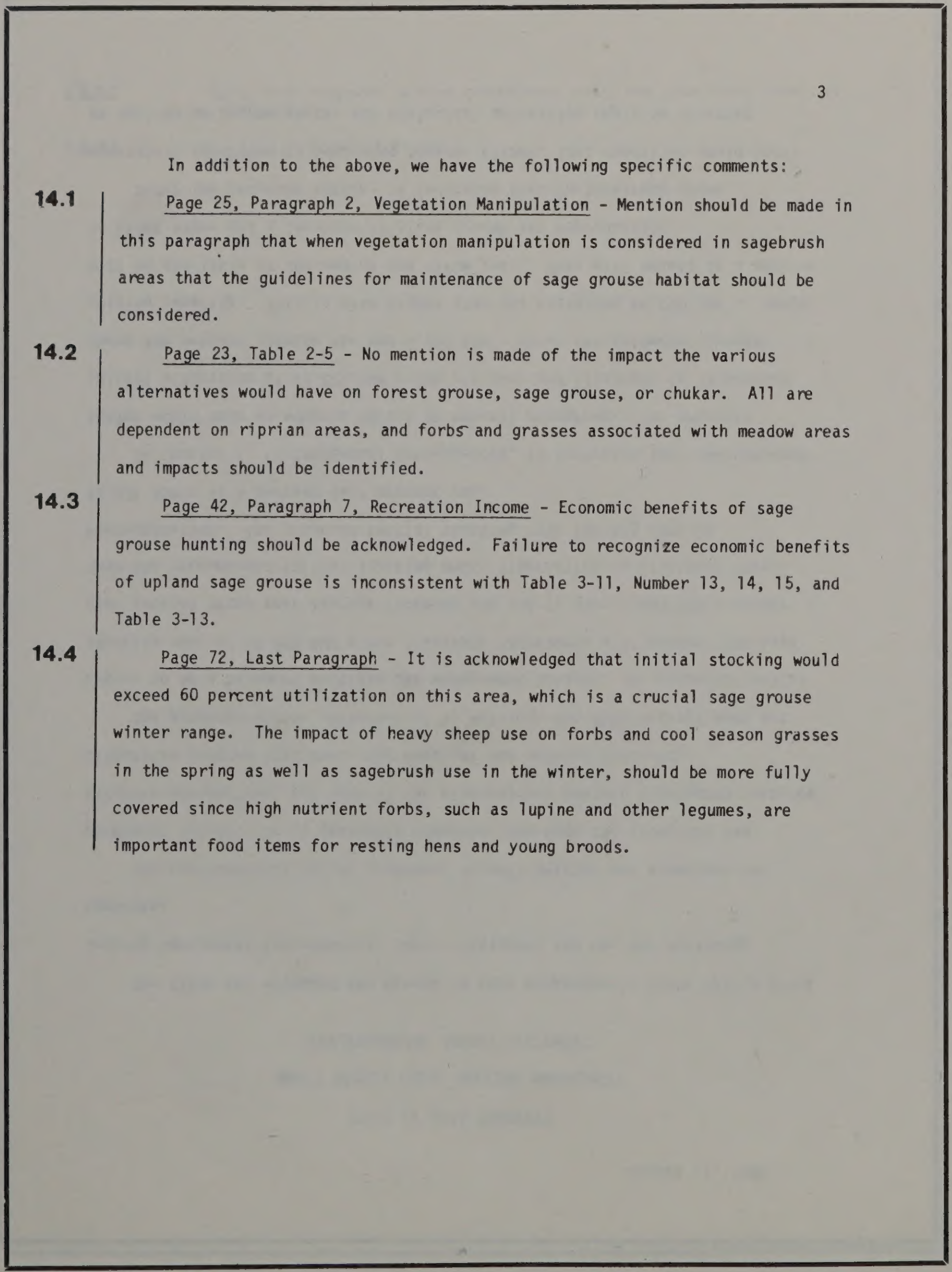
Therefore, in the short term, it is expected there would be no increase in forage production or improvement in ecological condition on 50 percent of the planning area, including riprian areas. On those allotments where the vegetation would be over utilized, ground cover would decrease leaving the soil less protected and more susceptible to erosion.

The Environmental Statement also concludes that, in the short run, the proposed action would have a negative impact on big game ranges by over utilizing the vegetation on 5,186 acres of critical deer winter range, 6,527 acres of critical deer year-long range, 6,354 acres of crucial elk winter range, and 25,115 acres of crucial antelope year-long range. The proposed action would also allow an increase in livestock use at Pariette Draw, which could adversely affect the Pariette Draw Waterfowl Area.

Thus, it appears that the proposed action, Alternative 1, would have an adverse impact in the short term and probably in the long term on the vegetative communities and soils.

Because of this and the fact the Environmental Statement recognizes that some of the allotments presently show signs of overgrazing and that much of the vegetation data is from 1960 range surveys, which affects its reliability, we do not believe that sufficient and reliable data is available to proceed with Alternative 1. The course of action decided upon should consider these facts. The initial stocking rate for both livestock and big game should be at a level that would not adversely affect the two basic resources--the vegetative communities and soils.

Comment Letter 14



In addition to the above, we have the following specific comments:

14.1 Page 25, Paragraph 2, Vegetation Manipulation - Mention should be made in this paragraph that when vegetation manipulation is considered in sagebrush areas that the guidelines for maintenance of sage grouse habitat should be considered.

14.2 Page 23, Table 2-5 - No mention is made of the impact the various alternatives would have on forest grouse, sage grouse, or chukar. All are dependent on riprian areas, and forbs and grasses associated with meadow areas and impacts should be identified.

14.3 Page 42, Paragraph 7, Recreation Income - Economic benefits of sage grouse hunting should be acknowledged. Failure to recognize economic benefits of upland sage grouse is inconsistent with Table 3-11, Number 13, 14, 15, and Table 3-13.

14.4 Page 72, Last Paragraph - It is acknowledged that initial stocking would exceed 60 percent utilization on this area, which is a crucial sage grouse winter range. The impact of heavy sheep use on forbs and cool season grasses in the spring as well as sagebrush use in the winter, should be more fully covered since high nutrient forbs, such as lupine and other legumes, are important food items for resting hens and young broods.

Response Letter 14

14.1	See Letter Response 8.9.
14.2	See Letter Response 8.10.
14.3	See Letter Response 8.11.
14.4	See Letter Response 8.13.

APPENDIX A

Ranch Budgets

U.S. GEOLOGICAL SURVEY
MENLO PARK
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TABLE 1

Average Costs and Returns for Small Beef Herds (0-99 Cows)

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Steer Calves	Head	20	390	73.63	5,743
Heifer Calves	Head	10	375	73.63	2,761
Yearling Steers	Head	--	--	--	--
Yearling Heifers	Head	3	650	62.11	1,211
Cull Cows	Head	6	850	41.27	2,105
Total					11,820
Total Per Cow					227

Cash Costs:	Value/Cow	Total Values
BLM Grazing Fee	7.85	408
Forest Grazing Fee	6.12	318
Private Range Lease/Rent	9.97	518
State Lease	1.26	65
Hay (produced)	13.57	706
Hay (purchase)	--	--
Protein Supplement	--	--
Irrigated Pasture	5.50	286
Salt and Minerals	1.40	73
Concentrate Feeds	--	--
Veterinary and Medicine	3.75	195
Hired Trucking	3.83	199
Marketing	3.71	193
Fuel and Lubricants	27.20	1,414
Repairs	23.84	1,239
Taxes	26.89	1,398
Insurance	6.72	349
Interest on Operating Capital	6.86	357
General Farm Overhead	11.42	594
Other Cash Costs	--	--
Hired Labor	.94	49
Total Cash Costs	160.79	8,361
Other Costs:		
Family Labor	44.84	2,332
Depreciation	49.43	2,570
Interest on Investment Other Than Land	117.42	6,106
Interest on Land	385.01	20,021
Total Other Costs	596.72	31,029
Total All Costs	757.50	39,390

Source: USDA, Economic, Statistics, and Cooperative Service (ESCS), 1982.

APPENDIX A (CONT.)

TABLE 2

Average Costs and Returns for Medium Beef Herds (100-299 Cows)

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Steer Calves	Head	70	390	73.63	20,101
Heifer Calves	Head	24	375	73.63	6,627
Yearling Steers	Head	8	670	62.11	3,329
Yearling Heifers	Head	20	650	62.11	8,074
Cull Cows	Head	28	850	41.27	9,822
Total					47,953
Total/Cow					237

Cash Costs:	Value/Cow	Total Values
BLM Grazing Fee	3.26	655
Forest Grazing Fee	4.44	892
Private Range Lease/Rent	13.33	2,679
State Lease	1.34	269
Hay (produced)	10.72	2,155
Hay (purchase)	4.31	866
Protein Supplement	--	--
Irrigated Pasture	11.70	2,352
Salt and Minerals	1.40	281
Concentrate Feeds	--	--
Veterinary and Medicine	4.95	995
Hired Trucking	1.70	342
Marketing	2.15	432
Fuel and Lubricants	22.33	4,488
Repairs	21.63	4,348
Taxes	24.16	4,856
Insurance	6.50	1,307
Interest on Operating Capital	8.40	1,688
General Farm Overhead	10.05	2,020
Other Cash Costs	--	--
Hired Labor	13.35	2,683
Total Cash Costs	165.72	33,308
Other Costs:		
Family Labor	25.90	5,206
Depreciation	49.00	9,849
Interest on Investment Other Than Land	117.07	23,531
Interest on Land	344.55	69,255
Total Other Costs	536.52	107,841
Total All Costs		141,150

Source: USDA, ESCS, 1982.

APPENDIX A (CONT·)

TABLE 3

Average Costs and Returns for Large Beef Herds (over 300 Cows)

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Steer Calves	Head	260	390	73.63	74,661
Heifer Calves	Head	101	375	73.63	27,887
Yearling Steers	Head	52	670	62.11	21,639
Yearling Heifers	Head	93	650	62.11	37,545
Cull Cows	Head	119	850	41.27	41,744
Total					203,476
Total Per Cow					239
Cash Costs:				Value/Cow	Total Values
BLM Grazing Fee				2.29	1,940
Forest Grazing Fee				10.57	8,953
Private Range Lease/Rent				14.79	12,527
State Lease				1.50	1,271
Hay (produced)				10.86	9,198
Hay (purchase)				4.15	3,515
Protein Supplement				--	--
Irrigated Pasture				12.93	10,952
Salt and Minerals				1.40	1,186
Concentrate Feeds				--	--
Veterinary and Medicine				1.55	1,313
Hired Trucking				1.85	1,567
Marketing				2.10	1,779
Fuel and Lubricants				10.75	9,105
Repairs				14.38	12,180
Taxes				27.01	22,877
Insurance				6.83	5,785
Interest on Operating Capital				6.99	5,921
General Farm Overhead				7.72	6,539
Other Cash Costs				--	--
Hired Labor				18.71	15,847
Total Cash Costs				156.38	132,454
Other Costs:					
Family Labor				12.35	10,460
Depreciation				48.65	41,207
Interest on Investment Other Than Land				112.77	95,516
Interest on Land				321.48	272,294
Total Other Costs				495.25	419,477

Source: USDA, ESCS, 1982.

APPENDIX A (CONT.)

TABLE 4

Average Costs and Returns for Small Sheep Herd
(1 to 999 Ewes)

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Slaughter Lambs	Head	236	93	60.83	13,351
Feeder Lambs	Head	122	82	60.83	6,085
Ewes	Head	41	145	26.86	1,597
Wool	Lbs.	412	10	.88	3,626
Wool Incentive Payment	Dol.	3,626		.39	1,414
Unshorn Lamb Payment	Cwt.	320		1.43	457
Total					26,530
Total Per Ewe					64

Cash Costs:	Value/Head	Total Values
BLM Grazing Fee	1.29	524
Forest Grazing Fee	1.59	643
State Lease	.27	108
Irrigated Pasture	--	--
Private Range Lease/Rent	2.65	1,073
Hay (purchased)	2.74	1,109
Hay (produce)	.70	282
Grain (purchase)	--	--
Protein Supplement	1.44	583
Other Feed	--	--
Salt and Minerals	.28	113
Spray and Dipping	.02	9
Veterinary and Medicine	.36	146
Marketing	.10	41
Trucking	2.44	988
Shearing and Tagging	1.90	769
Utilities	.63	255
Lamb Promotion	.03	12
Organizations	.10	40
Legal and Accounting	.38	154
Wool Storage	.08	33
Predator Control	.67	271
Ram Death Loss	.59	239
Fuel and Lubricants	1.78	721
Repairs	1.87	758
Hired Labor	5.21	2,109
Taxes	4.11	1,664
Insurance	.65	261
General Farm Overhead	1.19	482
Interest on Operating Capital	1.30	528
Total Cash Costs	34.36	13,915

Source: USDA, ESCS, 1982.

APPENDIX A (CONT.)

TABLE 5

Average Costs and Returns for Large Sheep Herd (1,000 or More Ewes)

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Slaughter Lambs	Head	1,621	93	60.83	91,703
Feeder Lambs	Head	835	82	60.83	41,650
Ewes	Head	278	145	26.86	10,827
Wool	Lbs.	2,831	10	.88	24,913
Wool Incentive Payment	Dol.	24,913		.39	9,716
Unshorn Lamb Payment	Cwt.	2,193		1.43	3,136
Total					181,945
Total Per Ewe					65

Cash Costs:	Value/Head	Total Values
BLM Grazing Fee	1.59	4,430
Forest Grazing Fee	1.57	4,360
State Lease	.25	708
Irrigated Pasture	--	--
Private Range Lease/Rent	2.52	7,014
Hay (purchase)	1.82	5,061
Hay (produced)	.51	1,417
Grain (purchase)	--	--
Protein Supplement	1.33	3,694
Other Feed	--	--
Salt and Minerals	.28	778
Spray and Dipping	.02	58
Veterinary and Medicine	.36	1,001
Marketing	.10	278
Trucking	2.44	6,783
Shearing and Tagging	1.90	5,282
Utilities	.63	1,751
Lamb Promotion	.03	83
Organizations	.10	278
Legal and Accounting	.38	1,057
Wool Storage	.08	222
Predator Control	.67	1,862
Ram Death Loss	.59	1,640
Fuel and Lubricants	1.78	4,948
Repairs	1.72	4,787
Hired Labor	3.47	9,647
Taxes	2.81	7,807
Insurance	.65	1,810
General Farm Overhead	1.19	3,308
Interest on Operating Capital	1.37	3,815
Total Cash Costs	30.17	83,878

Source: USDA, ESCS, 1982.

APPENDIX A (CONT·)

TABLE 6

Partial Ranch Budgets and Impact Analysis for Small Sheep Operator

Item	No Change	Percent Increased			Percent Reduced				
		10	20	30	10	20	30	40	50
					Dollars				
Gross Income	26,530	27,046	27,465	27,901	25,202	23,887	22,512	21,198	19,883
Total Cash Costs	13,915	14,108	14,160	14,215	13,644	13,272	12,884	12,512	12,140
Value of Family Labor	703	718	730	741	669	635	598	563	528
Depreciation	3,278	3,284	3,288	3,293	3,264	3,250	3,235	3,221	3,207
Interest on Investment Other Than Land	6,102	6,177	6,238	6,301	5,910	5,719	5,520	5,329	5,139
Return Above:									
Cash Costs	12,615	12,938	13,305	13,686	11,558	10,615	9,628	8,686	7,743
Cash Costs and Family Labor	11,912	12,220	12,575	12,945	10,889	9,980	9,030	8,123	7,215
Return to Total Investment	8,634	8,936	9,287	9,652	7,624	6,730	5,795	4,902	4,008
Return to Land	2,532	2,759	3,049	3,351	1,715	1,011	275	-427	-1,131
					Head				
Herd Size	405	413	419	426	385	365	344	324	304

APPENDIX A (CONT.)

TABLE 7

Partial Ranch Budgets and Impact Analysis for Large Sheep Operator

Item	No Change	Percent Increased			Percent Reduced				
		10	20	30	10	20	30	40	50
					Dollars				
Gross Income	181,945	185,340	188,714	192,106	178,556	175,183	171,790	168,398	165,024
Total Cash Costs	83,878	84,804	85,013	85,224	84,383	84,173	83,963	83,752	83,543
Value of Family Labor	9,647	9,826	10,005	10,185	9,467	9,288	9,108	8,928	8,749
Depreciation	19,774	19,812	19,851	19,889	19,736	19,697	19,659	19,621	19,582
Interest on Investment Other Than Land	40,101	40,593	41,082	41,574	39,609	39,119	38,627	38,135	37,646
Return Above:									
Cash Costs	98,067	100,532	103,701	106,882	94,173	91,010	87,827	84,646	81,481
Cash Costs and Family Labor	88,420	90,706	93,696	96,697	84,706	81,722	78,719	75,718	72,732
Return to Total Investment	68,646	70,894	73,845	76,808	64,970	62,025	59,060	56,097	53,150
Return to Land	28,545	30,301	32,763	35,234	25,361	22,906	20,433	17,962	15,504
					Head				
Herd Size	2,780	2,832	2,883	2,935	2,728	2,676	2,624	2,572	2,521

APPENDIX A (CONT.)

TABLE 8

Partial Ranch Budgets and Impact Analysis for Small Cattle Operator

Item	No Change	Percent Increased			Percent Reduced				
		10	20	30	10	20	30	40	50
					Dollars				
Gross Income	11,820	11,979	12,148	12,307	11,434	11,028	10,642	10,257	9,872
Total Cash Costs	8,361	8,450	8,545	8,634	8,089	7,800	7,527	7,254	6,981
Value of Family Labor	2,332	2,363	2,396	2,428	2,256	2,175	2,099	2,023	1,948
Depreciation	2,570	2,576	2,582	2,587	2,556	2,542	2,528	2,514	2,501
Interest on Investment Other Than Land	6,106	6,163	6,224	6,282	5,967	5,820	5,682	5,543	5,404
Return Above:									
Cash Costs	3,459	3,529	3,603	3,673	3,345	3,228	3,115	3,003	2,891
Cash Costs and Family Labor	1,127	1,166	1,207	1,245	1,089	1,053	1,016	980	943
Return to Total Investment	-1,443	-1,410	-1,375	-1,342	-1,467	-1,489	-1,512	-1,534	-1,558
Return to Land	-7,549	-7,573	-7,599	-7,624	-7,434	-7,309	-7,194	-7,077	-6,962
					Head				
Herd Size	52	53	53	54	50	49	47	45	43

APPENDIX A (CONT.)

TABLE 9

Partial Ranch Budgets and Impact Analysis for Medium Cattle Operator

Item	No Change	Percent Increased			Percent Reduced				
		10	20	30	10	20	30	40	50
	Dollars								
Gross Income	47,953	48,379	48,803	49,229	47,326	46,700	46,072	45,446	44,820
Total Cash Costs	33,308	33,670	34,032	34,394	33,188	33,068	32,947	32,827	32,707
Value of Family Labor	5,206	5,234	5,261	5,289	5,128	5,050	4,972	4,894	4,816
Depreciation	9,849	9,851	9,854	9,856	9,821	9,794	9,766	9,739	9,711
Interest on Investment Other Than Land	23,531	23,617	23,702	23,788	23,275	23,019	22,762	22,506	22,250
Return Above:									
Cash Costs	14,645	14,709	14,771	14,835	14,138	13,632	13,125	12,619	12,113
Cash Costs and Family Labor	9,439	9,475	9,510	9,546	9,010	8,582	8,153	7,725	7,297
Return to Total Investment	-410	-376	-344	-310	-811	-1,212	-1,613	-2,014	-2,414
Return to Land	-23,941	-23,993	-24,046	-24,098	-24,086	-24,231	-24,375	-24,520	-24,664
	Head								
Herd Size	201	202	203	204	198	195	192	189	186

APPENDIX A (CONT.)

TABLE 10

Partial Ranch Budgets and Impact Analysis for Large Cattle Operator

Item	No Change	Percent Increased 10	20	30	Percent Reduced 10	20	30	40	50
					Dollars				
Gross Income	203,476	203,689	203,903	204,117	203,256	203,037	202,818	202,598	202,378
Total Cash Costs	132,454	131,647	130,839	130,032	133,549	134,645	135,740	136,836	137,931
Value of Family Labor	10,460	10,089	9,719	9,348	10,209	9,958	9,706	9,455	9,204
Depreciation	41,207	40,979	40,751	40,523	41,059	40,911	40,762	40,614	40,466
Interest on Investment Other Than Land	95,516	95,627	95,738	95,849	95,469	95,422	95,376	95,329	95,282
Return Above:									
Cash Costs	71,022	72,042	73,064	74,085	69,707	68,392	67,078	65,762	64,447
Cash Costs and Family Labor	60,562	61,953	63,345	64,647	59,498	58,434	57,372	56,307	55,243
Return to Total Investment	19,355	20,974	22,594	24,124	28,439	17,523	16,610	15,693	14,777
Return to Land	-76,161	-74,653	-73,144	-71,725	-77,030	-77,899	-78,766	-79,636	-80,505
					Head				
Herd Size	847	848	849	850	846	845	844	843	842

TABLE 11

Alternative 1: Proposed Action - Multiple-Use Recommendation
Initial Changes to Net Cash Income

	Operator Size Class				
	Small Sheep	Large Sheep	Small Cattle	Medium Cattle	Large Cattle
Net Cash Income	15,210	118,625	3,493	14,850	74,936
Percent Change From Present Net Cash Income	+21	+21	+1	+1	+6

Source: Appendix 6.

TABLE 12

Alternative 2: Livestock Forage Recommendation
Initial Changes to Net Cash Income

	Operator Size Class				
	Small Sheep	Large Sheep	Small Cattle	Medium Cattle	Large Cattle
Net Cash Income	12,752	116,017	3,516	14,870	74,700
Percent Change From Present Net Cash Income	+1	+18	+2	+2	+5

Source: Appendix 6.

TABLE 13

Alternative 3: No Action - Active Preference Initial Changes to Net Cash Income

	Operator Size Class				
	Small Sheep	Large Sheep	Small Cattle	Medium Cattle	Large Cattle
Net Cash Income	17,053	130,577	3,506	14,857	77,489
Percent Change From Present Net Cash Income	+35	+33	+1	+1	+9

Source: USDI, BLM, 1982.

TABLE 14

Alternative 5: Wildlife Habitat Recommendation Net Cash Income and Capital Value Changes

	Operator Size Class				
	Small Sheep	Large Sheep	Small Cattle	Medium Cattle	Large Cattle
Net Cash Income	12,482	115,303	3,347	14,536	69,530
Percent Change From Present Net Cash Income	-1	0	-3	-1	-2
Present Change in Capital Value	-4	0	-16	-17	-15

Source: Appendix 6.

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